Mobility - Traffic and Safety and Non-motorized Travel

Conditions at 22 high crash locations[86] will potentially be improved with upgraded design. New construction would bring improved or expanded sidewalks.

Community – Relocations, Environmental Justice, and Emergency Services

Forty residential properties could be subject to relocation, as well as twenty-four businesses, but no institutions. The indirect developments associated with widening I-75 must be consistent with local planning and zoning, and the transportation planning of the Road Commission for Oakland County, SEMCOG, and local jurisdictions.

There would be no disproportionately high and/or adverse human health or environmental effects on minority or low-income populations, except the potential widening of South University Road between Paddock and Martin Luther King Boulevard may involve an area with low-income and minority persons.

Emergency services would encounter less congestion.

Environmental – Noise, Air Quality, Parks, Cultural Resources/Historic Properties, Wetlands, Water Quality, Farmland, and Threatened/Endangered Species and Sensitive Habitats

Widening 56+ miles of arterials could affect over 700 residential units, eight schools/hospitals, and 22 churches with increased noise, if the widened arterial becomes closer to homes. No hospitals or schools are expected to experience increased noise, but three churches could.

Smoother traffic flow is expected to have a positive effect on air quality for those arterials to be widened as an indirect result of I-75 widening.

The following parks would have to be reviewed for impacts as a result of the cumulative development associated with I-75's widening:

- Avon Nature Study Area
- Sullivan Park
- Amherst Park
- Waterford Oaks Park
- Troy Farm Park
- Donald J. Flynn Park
- Pinetrace Park

The following cultural resources may need to be reviewed for impacts:

- Five archaeological sites
- Historic Troy Corners
- Saterlee
- Samuel House
- Meadowbrook Farm

[86]Compiled by the Traffic Improvement Association of Oakland County.

Table 4-23
Potential Cumulative Effects of Widening I-75 -North-South Roads

	Evaluation Factors	Dequindre	John R. Road	Rochester	Livernois		Crooks Road	Greenfield	Adams		Adams Road	Joslyn	Baldwin	Sashabaw	Scott Lake
		Long Lake to Auburn	Long Lake to South Boulevard	Wattles to Hamlin	Long Lake to Square Lake	Square Lake to Avon	14 Mile to Maple	Thirteen Mile to Fourteen Mile	Big Beaver to Auburn	Hamlin to Tienken	Maple Road to Big Beaver Road	Silverbell to Brown	Maybee to Morgan	Clarkston to Dixie	Dixie to Pontiac Lake Rd
		1	2	3	5	6	7	9	10	11	11A	13	14	15	16
Mobility	Safety – High Crash Locations Addressed	0	0	7	0	0	2	0	0	1	2	0	0	2	0
	Effect on Non-motorized Travel	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive
Community	Residential Relocation Potential	0	2	4	0	1	0	0	2	0	1	8	0	14	0
	Business Relocation Potential	1	0	9	0	0	2	0	1	0	0	1	2	5	0
	Institutional Relocation Potential	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Environmental Justice	No dispro-portionate effect	No dispro-Portionate Effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate Effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect
	Effects on Emergency Services	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive
Environmental	No. of Residential Units Potentially Exposed to Increased Noise Levels	87	96	72	52	120	20	43	185	129	71	6	38	165	32
	No. of Hospitals/Schools Potentially Exposed to Increased Noise Levels	0/0	0/1	0/0	0/1	0/3	0/0	0/0	0/3	0/0	0/0	0/0	0/1	0/1	0/1
	No. of Churches Potentially Exposed to Increased Noise Levels	1	1	1	1	3	0	0	5	0	1	0	1	2	1
	Air Quality	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive
	Parks – Potential Acres Affected	0	0	0	0	1.6	0	2	1	0	0	0	0	4	1
	Cultural Resources/Historic Properties – Potential Number Affected	0	1	10	2	1	0	0	4	2	0	0	0	0	0
	Wetlands – Potential Acres Affected	0.3	2.4	0	0	0.4	0	0	1	6.3	0	0	0	1.5	0
	Water Quality Potential for Increased Runoff	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Sensitive Plant/Animal Habitats Impact	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal
Economic	Effects on Economic Vitality	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Minimal	Positive	Positive	Positive	Positive

Source: The Corradino Group of Michigan, Inc.

Table 4-23
Potential Cumulative Effects of Widening I-75 - East-West Roads

	Evaluation Factors	Taylor Road Giddings to M-24	13-Mile Greenfield to Southfield	Big Beaver Dequindre to Rochester	Quarton Woodward to Adams	Long Lake Road Coolidge to Adams	Square Lake Telegraph to Franklin	South Boulevard Dequindre to I-75	South University Road Paddock to MLK	Pontiac Lake Road Scott Lake to County Center Drive	Walton Boulevard Perry Street to Squirrel	Williams Lake Airport to Dixie	County Center Drive Pontiac Lake Telegraph	Dixie Highway Davisburg I-75	Wattles Road Chesterfield Road to Adams Road
		17	18	19	20	21	22	23	24	25	27	28	29	31	32
Mobility	Safety – High Crash Locations Addressed	0	0	2	0	0	2	0	1	0	2	1	0	0	0
	Effect on Non-motorized Travel	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive
Community	Residential Relocation Potential	0	0	0	0	0	0	2	1	0	0	4	0	1	0
	Business Relocation Potential	0	0	0	0	0	0	1	1	0	0	1	0	0	0
	Institutional Relocation Potential	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Environmental Justice	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	26-50% poverty 50% + minority	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect	No dispro-portionate effect
	Effects on Emergency Services	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive
Environmental	No. of Residential Units Potentially Exposed to Increased Noise Levels	0	76	32	22	1	0	217	18	14	63	39	0	8	11
	No. of Hospitals/Schools Potentially Exposed to Increased Noise Levels	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0
	Number of Churches Potentially Exposed to Increased Noise Levels	0	0	1	0	0	0	0	3	1	0	0	0	0	0
	Air Quality	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive
	Parks – Potential Acres Affected	0	0	0	0	0	0	0.3	0	0	0	0	0	0	0
	Cultural Resources/Historic Properties – Potential Number Affected	0	0	0	0	0	0	0	0	0	0	0	0	1	0
	Wetlands – Potential Acres Impacted	0	0	0	0.6	0	0	1.4	0	0	0	0	0	0	0
	Water Quality Potential for Increased Runoff	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Sensitive Plant/Animal Habitats Impact	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal
Economic	Effects on Economic Vitality	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Neutral

Source: The Corradino Group of Michigan, Inc.

The widening of 56+ miles of arterials as a cumulative effect of widening I-75 could impact about eight acres of wetlands at the following locations:

- Square Lake Road at John R Road
- Clinton River near Avon and Livernois Roads
- South Boulevard at Adams
- Avon Road at Adams Road
- Maybee Road at Sashabaw
- Rouge River on Quarton Road
- South Boulevard west of Crooks Road

No significant effect is expected on water quality. The increased runoff will be subject to state and county permitting.

No prime or unique farmland impacts are expected from the widening of 56+ miles of arterials.

No significant effect is expected on threatened or endangered species or their habitats.

Economy

Widening I-75 will have an effect on wealth distribution, but it is just one of many public policy decisions and market driven actions that are at work. Failure to widen I-75 is not a substitute for the need for fundamental changes, nor will it protect the wealth and quality of life of all commuters in Oakland County and Southeast Michigan. Such change is embodied in the recommendations Governor Granholm's Michigan Land Use Leadership Council.

4.19 Energy

Energy will be used to construct the project. Fuel savings to motorists should be realized in the long term due to improved traffic flow. Stop and go traffic is very fuel inefficient. Increased capacity on I-75 will reduce congestion and the extent of stop and go traffic. Motorists will be able to maintain more constant traveling speeds on the freeway. The additional lane will allow greater ability to move around incidents. Travel on freeways is more fuel efficient than travel on arterial streets, which are controlled by traffic signals, causing all traffic to stop at some point.

4.20 Cost

Total project costs include: design/construction management, right-of-way/relocation, and construction. Construction costs are based on average unit bid prices and estimated quantities from the engineering analysis, and include contingencies. Project design and construction management represent an add-on to the construction cost. The right-of-way/relocation cost is preliminary and is based on fair market value.

The base project cost in approximately $572 million (2005 dollars), consisting of $93 million for design and construction management, $16 million for right-of-way and relocation, and $463 for construction. The construction cost includes the HOV lane at about $6 million - $3.5 million for signing and striping and other road work, plus $2.5 million for bridges and roadwork through the Square Lake interchange.

4.21 The Relationship Between Local Short-Term Uses of the Environment and the Maintenance and Enhancement of Long-Term Productivity

Environmental impacts would result during the construction of the Preferred Alternative. Reconstruction of bridges and service drives would temporarily affect the mobility of local residents, access to businesses, and emergency services. The impacts would continue through the construction period, but local mobility and access would return and improve upon project completion.

This project is a result of local, regional, and statewide comprehensive and transportation planning. Present and future traffic needs were considered and are reflected in the Preferred Alternative. It is concluded that the local short-term impacts and use of resources by the proposed action, if it were approved, are consistent with the maintenance and enhancement of long-term productivity for both the local area and the State of Michigan.

4.22 Irreversible and Irretrievable Commitments of Resources Which Would be Involved in the Proposed Action

Implementation of the proposed action involves the commitment of a range of natural, physical, human, and fiscal resources. Land used for reconstruction of I-75 is an irreversible commitment.

Considerable amounts of fossil fuels, labor, and highway construction materials such as cement, aggregate, and bituminous material will be expended for this project, if approved. Additionally, large amounts of labor and natural resources will be used in the fabrication and preparation of construction materials. However, these materials are not in short supply, and their use will not have an adverse effect upon continued availability of these resources.

Construction of this project will require a substantial one-time expenditure of state, federal, and local funds that are not retrievable. The commitment of these resources will result in an improved transportation system, providing improved accessibility and safety, and savings in time and operational costs. These are anticipated to outweigh the commitment of these resources.

SECTION 5
MITIGATION OF IMPACTS

The goal of mitigation measures is to preserve, to the greatest extent possible, existing neighborhoods, land use, and natural resources, while improving transportation. Although some adverse impacts are unavoidable, the Michigan Department of Transportation (MDOT), through route location, design, environmental, and construction processes, takes precautions to protect as many social and environmental systems as possible. Construction activities that include the mitigation measures discussed below are those contained in the current MDOT "Standard Specifications for Construction."

This section discusses the standard or general mitigation measures applicable to most MDOT projects of this type. Without the benefit of detailed design plans, tentative mitigation ideas are proposed as a means to avoid or reduce adverse impacts on identified resources. Further agency coordination will continue through the design stage. Design plans will be reviewed by many MDOT personnel prior to contract letting in order to incorporate any additional social, economic, or environmental protection items. Construction sites will be reviewed to ensure that the mitigation measures proposed are carried out, and to determine if additional protection is required. More mitigation measures may be developed if additional impacts are identified. Specific mitigation measures will be included in the design plans and permit applications. Project-specific mitigation measures are also summarized on the "Green Sheet" located at the end of this section. This summary lists the project-specific measures by category.

5.1 Right-of-Way Acquisition and Relocation Impacts

A Conceptual Stage Relocation Plan has been prepared (Appendix B). The following standard procedures will be followed.

Compliance with State and Federal Laws – Acquisition and relocation assistance and advisory services will be provided by the Michigan Department of Transportation (MDOT) in accordance and compliance with Act 31, Michigan P.A. 1970; Act 227, Michigan P.A. 1972; the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended; and, Act 87, Michigan P.A. 1980, as amended. The MDOT will inform individuals, businesses, and non-profit organizations of the impact, if any, of the project on their property. Every effort will be made, through relocation assistance, to lessen the impact when it occurs.

Residential – The MDOT is required by statute to determine the availability of comparable, decent, safe and sanitary housing for eligible displaced individuals. The MDOT has specific programs to implement the statutory and constitutional requirements of property acquisition and relocation of eligible displacees. Appropriate measures will be taken to ensure that all eligible displaced individuals are advised of the rights, benefits, and courses of action open to them.

Businesses or Non-profit Organizations – The MDOT is required by statute to offer relocation to displaced businesses and non-profit organizations. The MDOT has specific programs that will implement the statutory and constitutional requirements of property acquisition and relocation of eligible displacees. Appropriate measures will be taken to ensure that all eligible displaced businesses or non-profit organizations are advised of the rights, benefits, and courses of action open to them. Displaced businesses and organizations will be encouraged to relocate within the same community.

Purchasing Property - The MDOT will pay just compensation for fee purchase or easement use of property required for transportation purposes. "Just compensation" as defined by the courts is the payment of "fair market value" for the property rights acquired, plus allowable damages to any remaining property. "Fair market value" is defined as the highest price estimated, in terms of money, the property would bring if offered for sale on the open market by a willing seller, with a reasonable time allowed to find a purchaser, buying with the knowledge of all the uses to which it is adapted, and for which it is capable of being used.

Relocation Information – A booklet entitled "Your Rights and Benefits" detailing the relocation assistance program can be obtained from the Michigan Department of Transportation, Real Estate Support Area, P.O. Box 30050, Lansing, Michigan, 48909 or phone (517) 373-2200.

Property Acquisition Information - A booklet entitled "Public Roads & Private Property" detailing the purchase of private property can be obtained from the Michigan Department of Transportation, Real Estate Support Area, P.O. Box 30050, Lansing, Michigan, 48909 or phone (517) 373-2200.

5.2 Noise Walls

This project proposed to construct noise walls at 18 locations. Noise mitigation is detailed in Table 4-14. When the project proceeds to design, provisions will be made for fire hydrant access through noise walls. Discussions with all adjacent municipalities will identify these locations and other locations where access through the wall may be necessary. Where there are extensive lengths of noise wall, locked panels are sometimes provided to allow emergency personnel access through the walls. Coordination with local municipalities regarding these issues and aesthetics will be conducted in the design phase of the project. Noise wall locations and design details will be reviewed during final design.

5.3 Soil Erosion and Sedimentation Control

Accelerated sedimentation caused by highway construction will be controlled before it enters a water body or leaves the highway right-of-way by the placement of temporary or permanent erosion and sedimentation control measures. MDOT has developed a series of standard erosion control items to be included on design plans to prevent erosion and sedimentation. The design plans will describe the erosion controls and their locations. Payment is made to the contractor for construction and maintenance of items used from this list or items specifically developed for the project.

MDOT has on file with the Michigan Department of Environmental Quality (MDEQ) an approved operating erosion and sedimentation control program which ensures compliance with Part 91, Soil Erosion and Sedimentation Control of Act 451 (Natural Resources and Environmental Protection), as amended. MDOT has been designated an "Authorized Public Agency" and is self-regulated in its efforts to comply with Part 91. However, MDEQ may inspect and enforce soil erosion and sedimentation control practices during construction to ensure that MDOT and the contractor are in compliance with Part 91 and the acceptable erosion and sedimentation control program.

The following is a list of the mitigation measures for this project to be carried out in accordance with permit requirements.

1. No work will be done in the channels of the River Rouge, or other water courses during periods of seasonally high water, except as necessary to prevent erosion.

2. All construction operations will be confined to the highway right-of-way limits or acquired easements.

3. Areas disturbed by construction activities will be stabilized and vegetated as soon as possible during the construction period in order to control erosion. Road fill slopes, ditches, and other raw areas draining directly into the River Rouge will be protected with riprap (up to three feet above the ordinary high water mark), sod, seed and mulch, or other measures, as necessary to prevent erosion.

4. Special attention will be given to protecting natural vegetative growth outside the project's construction limits from unnecessary removal or siltation. Natural vegetation, in conjunction with other sedimentation controls, provides filtration of highway runoff.

5. Protection of storm sewer inlets will be done to prevent sediment from entering the storm sewer system.

6. The contractor shall have the capability of performing seeding and mulching at locations within 500 feet of any wetlands, lakes, streams, and drains within 24 hours of being directed to perform such work by the project engineer.

7. The contractor is responsible for preventing the tracking of material onto local roads and streets. If material is tracked onto roads or streets, it shall be removed.

5.4 River, Stream and Drain Crossings

Bridge and culvert work at river, stream, and drain locations will require construction staging and additional protection items to minimize impacts on the water course. The following are general mitigation items designed to reduce impacts at water crossings. The design plans will show all specific controls for each watercourse.

1. All work below the ordinary high water mark of any river, stream or drain will require permits from MDEQ and/or the U.S, Army Corps of Engineers. All permit conditions will be adhered to during construction. Permit conditions may include fish spawning protection dates where no work can occur in the water unless it is isolated behind a cofferdam installed prior to the start of the protection date.

2. All construction operations adjacent to watercourses will include appropriate soil erosion and sedimentation controls (Section 5.3).

3. All construction activities will be isolated from the flowing watercourse where possible. This can be done by installing a cofferdam (steel sheeting or sand bags) around the construction area. Another method may be to construct a temporary channel to relocate the existing watercourse while construction takes place at the existing watercourse location. The temporary channel and proposed new channel shall be stabilized prior to water flow being diverted into it.

5.5 Environmental Permits

Proposed construction activities will involve the need for permits. Impacts on bodies of water such as lakes, streams, drains and wetlands will require permits under federal and state law:

Federal

- Executive Order 11990
- Clean Water Act of 1977, as amended: Section 401, state Water Quality Certification; Section 402(p), National Pollutant Discharge Elimination System, storm water permit; and, Section 404, related to dredge and fill.

Federal Executive Order 11990 states that when federal funds are used on a project, impacts to any wetland (regardless of size) will require that there be no practicable alternative to impacts on that wetland.

Section 401 of the Clean Water Act of 1977, as amended, requires certification from the state's water quality agency (MDEQ) to ensure that the discharge of dredged or fill material complies with the provisions of the Federal Water Pollution Control Act.

Section 402(p) of the Clean Water Act and subsequent regulation under 40 CFR 122.26 requires a National Pollutant Discharge Elimination System Storm Water discharge permit for construction projects that involve land clearing or disturbance of five acres or greater. Permit application requirements include: 1) a location map and description of the nature of the construction activity; 2) location of the proposed discharge; 3) total area of the site and area to be disturbed; 4) an estimate of the runoff coefficient of the site and the increase in impervious area after construction is complete; and, 5) the nature of the fill. The intent of these requirements is to reduce impacts on water quality during and after construction.

Section 404 of the Clean Water Act requires a permit from MDEQ (acting for the U.S. Army Corps of Engineers) for the excavation and discharge of dredged and/or fill material in "waters of the United States," including wetlands. Section 401 Water Quality Certification from MDEQ is required prior to the issuance of the Section 404 permit.

State – Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended:

- Part 31, Water Resource Protection
- Part 55, Air Pollution Control
- Part 301, Inland Lakes and Streams
- Part 303, Wetland Protection

Parts 31 and 301 of Michigan Act 451 are administered by the MDEQ. A Part 31 permit (which is reviewed and issued with the Part 301 application) is needed to place fill material within any part of a floodplain with a drainage area of two square miles or more. A Part 301 permit is required for any work below the ordinary high water mark of any inland lake, stream, or drain including the placement of any permanent or temporary river or stream structure.

A Part 55 air quality permit is required for any bituminous or concrete proportioning plant or crusher.

A Part 303 wetland permit is required for any wetland disturbance, permanent, as well as temporary. The Part 303 permit is reviewed and issued as a single permit that also includes Part 301 and Part 31.

Final mitigation measures proposed in areas requiring the above permits will be developed in consultation with the appropriate agencies, and will be included in the permit application(s).

5.6 Existing Vegetation

The existing natural and ornamental vegetative cover will be retained wherever and whenever possible within the right-of-way limits. Where the existing ground cover must be removed, replacement vegetation will be established in a timely manner, using seed and mulch or sod.

Trees within MDOT right-of-way will be saved as long as safety requirements are met. All property owners will be notified before any trees in front of their residences are removed and will be offered replacement trees to help offset the aesthetic and/or functional loss of trees.

Replacement tree species, numbers, and planting recommendations will be made jointly by MDOT's Roadside Development Section and/or the Region Resource Specialist as part of the project design process following contact and coordination with adjacent property owners. For those owners who request replacement trees, the trees are to be replaced (with the property owners' approval) on their property as close to the right-of-way line as possible. The property owners will then assume the responsibility for maintaining these trees.

As a part of the project design phase, opportunities to enhance the visual quality along I-75 will be studied for implementation. This will include landscaping that utilizes native vegetation in interchange areas, and the addition of vegetative screens to help buffer I-75 from adjacent unattractive or sensitive land uses.

The U.S. EPA in a letter dated February 23, 2004 (Section 6.4, Letter 4) recommends use of native vegetation as part of the project's storm water management plan and elsewhere along the right-of-way limits, especially in the vicinity of 13 Mile Road. During the design phase of this project, MDOT will provide a more detailed plan, which will incorporate native vegetation as a part of the project's storm water management plan, near right-of-way limits and in the vicinity of 13 Mile Road.

5.7 Disposal of Surplus or Unsuitable Material

Surplus or unsuitable material generated by the removal of structures, trees, etc., will be disposed of in accordance with the following provisions designed to control the possible detrimental impacts of such actions. When surplus or unsuitable material is to be disposed outside of the right-of-way, the contractor will obtain and file with MDOT written permission from the owner of the property on which the material is to be placed. In addition, no surplus or unsuitable material will be disposed in any public or private wetland area. Inert material may be used as a basement fill to a depth not less than two feet below the ground level, if the basement is not within the roadway cross section. Such material must be covered with at least two feet of clean soil to fill voids. Basement walls are to be removed to ground level. All regulations of the MDEQ governing disposal of solid wastes will be complied with.

5.8 Contamination

A Preliminary Site Investigation is needed at the Marathon Unit #711 (Service Drive Auto) at 402 South Stephenson Highway in Royal Oak. That site has underground storage tanks and is planned for right-of-way acquisition.

Standard mitigation measures that could apply include:

- A Preliminary Site Investigation with any areas of contamination marked on design plans.
- Proper disposal of any contaminated soil.
- Testing/treatment of water from any dewatering operations before pumping to storm drains or surface water discharge points.
- Testing of river bottom sediments to determine proper disposal methods.
- Preparation of underground utility plans to ensure no deep utility cuts will impact any contaminated areas. Any utility cuts in contaminated areas will be reviewed to ensure proper excavation and backfill methods.
- Preparation of a Risk Assessment Plan, which includes a Worker Health and Safety Plan, to reduce dermal exposure and address direct contact issues, if contaminated materials are encountered.
- Closing and abandoning any monitoring wells properly.

5.9 Groundwater Quality

The sealing of water wells, septic systems, and sewer lines for the protection of groundwater quality will be ensured by the enforcement of MDOT specifications imposed on the contractor during construction. For houses or other structures with sewer service that are relocated or must be razed, sewer lines will be filled with concrete grout at the basement level, and water will be turned off at the street. In rural areas, the sewer line to the septic tank must be filled at the basement level. Abandoned water wells will be filled with grout applied from the bottom upwards through a conduit extended to the bottom of the well in one continuous operation until the well is filled. The contractor must also meet all local and Michigan Department of Community Health (MDCH) requirements.

Contractors will generally be allowed 60 to 90 days following issuance of the demolition contract for the site to be completely cleared. However, no more than 48 hours will be permitted following removal of any structure to fill the foundation to ground level. If the foundation is not filled within this time, MDOT will take independent action to fill the foundation, charging costs incurred to the contractor. The MDEQ notification procedures for demolitions will be followed.

The above specifications have been approved by the Michigan Department of Community Health. The contractor will also be referred to the local health department for assistance when special conditions such as flowing wells or wells with a high artesian head are encountered. If high water tables are encountered in cut sections, special methods will be used to reduce any negative effects on the area groundwater.

Drainage structures will be built as necessary along the pavement to drain the roadway sub-base. Edge drains will be used to intercept horizontal seepage. Stone baskets will be used to maintain and reroute the flow of springs when found below the roadway. Intercepted water will be discharged into an available roadside ditch, watercourse, or storm sewer. Although siltation of

such watercourses from this intercepted water is rare, it will be controlled, when necessary, by the placement of material around the edge drainpipe to filter fine material.

5.10 Surface Water Quality

Adequate soil erosion and sedimentation control measures will be implemented. Rural drainage with grass slopes and swales will be maintained where possible, subject to the results of the ongoing drainage analysis. A combination of detention basins, sediment basins and vegetated ditches will be used to promote infiltration, thereby reducing the potential impacts on the streams from added runoff and associated pollutants, including deicing salts and heavy metals.

Because there will be a substantial amount of ditch detention, MDOT will explore use of native vegetation or other vegetation for use in these ditch areas to filter runoff and associated pollutants. See Section 5.6.

In the depressed section of I-75 between M-102 (8 Mile Road) and 12 Mile Road the storm water from I-75 flows into the combined sewer system that serves the area. With the project the storm water from I-75 will be separated from the existing system. By providing its own system for I-75 storm water, MDOT will positively affect water quality by: 1) reducing flow in the combined sewer system so that overflows of sewage into the Red Run Drain occur less frequently; and, 2) reducing flow to the Detroit wastewater treatment plant, so that facility treats less storm water. However, by diverting I-75 runoff from the combined system, there is the potential for increased amounts of pollutants from road runoff to be discharged, but this will be mitigated through installation of Best Management Practices to the maximum extent practical.

5.11 Maintaining Traffic During Construction

The disruption of traffic in the construction area will be minimized to the extent possible. Two lanes will be kept open in each direction on I-75 at all times. All construction areas and altered traffic patterns will be clearly marked during the construction phase. A preliminary construction staging program that calls for part-width construction has been developed and is the subject of ongoing review to ensure the constructability of the project and minimize impacts to the local neighborhoods and the motoring public.

Part-width construction is applicable where the road is widened, such as with this project. But, as total reconstruction of I-75 is planned to coincide with the lane addition, the entire road width will be closed at one time or another. In the depressed section, bridges will be replaced. This means there will be brief periods when one side of the freeway will have to be totally closed as bridge beams are removed and new ones put in place. The general process in the depressed section would be:

- Excavate for and construct the new lane and outside shoulder on side 1 of the freeway.
- Make simultaneous improvements to service drives.
- Construct the new bridges over side 1.
- Divert all traffic to side 1, which would have 4 lanes, two in each direction, plus adequate lateral clearances.
- Construct the bridges on side 2.
- Use service drives as necessary to detour traffic. All service drives can carry two lanes of traffic.

In the at-grade/elevated section from 12 Mile Road north the process would be:

- The bridges would be widened to the inside on one side of the freeway.
- The inside lane addition would be made on that side.
- All traffic would shift to that side of the road.
- The other side of the road would be completely reconstructed with the bridge widening and lane addition.
- Finally, traffic would shift to the fully constructed side and the original side would be reconstructed.

MDOT will establish official detour routes over the state trunkline system. The project will be built in phases so that the entire length of I-75 is not under construction at once. Consequently, the posted detours will vary depending on the section under construction. It is likely that detour routes will include all state trunklines in the area, including M-1 (Woodward Avenue), M-102 (8 Mile Road), I-696, I-75 BL/BR 24 (Square Lake Road), and M-59. The proposed detour routes will be determined in the design phase through coordination with local jurisdictions.

There are service drives on either side of the depressed section of I-75. Due to the short blocks that prevail in this section of the corridor, access can be maintained to local properties.

It is anticipated that multiple construction seasons will be needed to complete the project. The number of years is dependent on funding availability. Construction phasing involves a number of factors, beyond funding availability, such as: length of a segment; type of proposed facility (bridges, ramps, mainline); political jurisdictions; and, related projects. Drainage patterns could also influence the definition of final segments. Other important considerations are the level of congestion of project segments and the cost effectiveness of constructing these segments.

The section with the greatest need from the standpoint of congestion, capacity, and safety is north of I-696. The proposed ramp braiding in that location would have a positive effect on the entire northbound section of I-75 from north of 8 Mile Road to near 12 Mile Road. Therefore, the recommendation is to construct the ramp braiding first. Congestion analyses find that the next steps would be to work from the south to the north along the corridor. Details of construction phasing will be developed in later phases of the project.

It is anticipated that (based on available funding) special transit services will be initiated in advance of the construction period. Existing MDOT and SEMCOG rideshare programs would be enhanced, with particular emphasis on major corridor employers. New bus transit service could be established on I-75 serving park-and-ride lots to encourage a mode shift away from single-auto occupancy vehicles. In addition, MDOT continues to seek new carpool lots to develop along the I-75 corridor. Michivan, a private organization that promotes ridesharing, can also be key in maximizing the availability of alternative transportation modes during and after construction.

5.12 Continuance of Public Utility Service

Utilities will require relocation or adjustment. In doing so, coordination between MDOT and the affected utility company will take place during design, prior to actual construction. Proposed staging plans will also be presented to utilities to make them aware of the project. Service to the project area will be maintained with temporary connections during construction so service interruptions will be minimized.

5.13 Construction Noise and Vibration Impacts

Construction noise will be minimized by measures such as requiring that construction equipment have mufflers; that portable compressors meet federal noise-level standards for that equipment; and, that all portable equipment be placed away from or shielded from sensitive noise receptors, if at all possible. All local ordinances will be adhered to.

Where pavement must be fractured, structures must be removed, and/or piling or steel sheeting must be driven, care will be taken to prevent vibration damage to adjacent structures. In areas where construction-related vibration is possible, basement surveys will be offered. These areas will be identified during the design phase and surveys would be conducted before construction begins to document any damage caused by highway construction. Geotechnical analysis being conducted for the project will aid in the understanding of potential vibration impacts and mitigation. Vibration impacts are not anticipated at this time.

5.14 Control of Air Pollution During Construction

The contractor will be required to comply with all federal, state and local laws and regulations governing the control of air pollution.

Dust Control: During construction of any project, adequate dust-control measures will be maintained to avoid detriment to the safety, health, welfare, or comfort of any person, or cause damage to any property or business.

Bituminous and Concrete Plants: All bituminous and concrete proportioning plants and crushers will meet the requirements of the rules of Part 55 of Act 451, Natural Resources and Environmental Protection. For any portable bituminous or concrete plant or crusher, the contractor must apply for a permit-to-install or general permit from the Permit Section, Air Quality Division of the MDEQ. This permit should be applied for a minimum of 45 calendar days for plants with an active MDEQ permit (or 75 calendar days for plants not previously permitted in Michigan) prior to the plant being installed.

Dust collectors must be provided on all bituminous plants. Dry, fine aggregate material removed from the dryer exhaust by the dust collector must be returned to the dryer discharge unless otherwise directed by the project engineer.

5.15 Wetland Mitigation

Wetland mitigation will conform to Executive Order 11990 and the Michigan Natural Resources and Environmental Protection Act (PA 451 of 1994, as amended), Part 303 – Wetland Protection, administered by MDEQ. Impacts to wetlands will require a permit under Part 303. Wetland mitigation adjacent to the study area is preferred by regulatory agencies so that replacement will occur as close to the impact as possible.

Delineated wetlands are all within, or contiguous to, the existing right-of-way of I-75. The No Build and GP alternatives had no wetland impacts. The Preferred Alternative would require unavoidable impacts at the Square Lake Road interchange to construct the northbound HOV lane through the interchange. The impact will be to approximately 0.41 acres of wetlands, as follows:

- Wetland 39 – Palustrine Emergent and Palustrine Shrub/Scrub - 0.25 acres
- Wetland 41 - Palustrine Emergent and Palustrine Shrub/Scrub - 0.16 acres

Compensatory wetland restoration or creation is planned in accordance with state and local wetland protection ordinances. The emergent and scrub shrub wetlands that would be affected by this project would be mitigated at a 1.5:1 ratio, so that each acre of impact is compensated with 1.5 acres of mitigation wetland, for a total mitigation need of 0.6 acres.

The impacted wetlands fall within the ecoregion called Sub-subsection VI.1.2 Ann Arbor Moraines, of Subsection VI.1 Washtenaw, of Section VI Southern Lower Michigan.[87] They are within the Clinton River watershed. The wetland impact site and the proposed mitigation site are shown in Figure 5-1.

The mitigation site is located in the southeast quadrant of Section 25 of Armada Township in Macomb County. It falls within the ecoregion called Sub-subsection VI.1.1 Maumee Lake Plain, of Subsection VI.1 Washtenaw, of Section VI Southern Lower Michigan. The National Resource Conservation Service has classified the site as Prior Converted wetland. The site has been cleared of any environmental issues. The MDEQ approved use of this site in a letter dated December 21, 2004 (see Section 6.4, Letter 6c).

A detailed wetland mitigation and monitoring plan will be designed by MDOT that will restore adequate hydrology to the mitigation site to re-establish wetland habitats. The primary emphasis will be on minor grading and construction of low-head berms, along with water control structures. A mitigation and monitoring plan will be prepared to document the development of the created wetland. The plan will include performance criteria, address the control of invasive species, and specify the protection of the mitigation area in perpetuity through use of a conservation easement.

Minimization of sedimentation to wetlands during construction would be accomplished by soil erosion and sediment control practices consistent with conditions of MDOT's Soil Erosion and Sedimentation Control Program. As the project includes major reconstruction of the interstate, and ordinarily the disturbance limits of construction equipment are broad in such circumstances, construction contracts will specify that there be no disturbance in the delineated wetland areas.

5.16 National Geodetic Survey Monuments

The corridor will be reviewed prior to construction to determine the location of U.S. Department of Commerce, National Geodetic Survey monuments (http://www.ngs.noaa.gov) to prevent disturbance to such monuments. If there is any anticipated disturbance, 90-day notification in advance will be given to the National Geodetic Survey.

5.17 Additional Mitigation or Modifications

The final mitigation package will be reviewed by division representatives on the MDOT project study team, in cooperation with concerned state, federal, and local agencies.

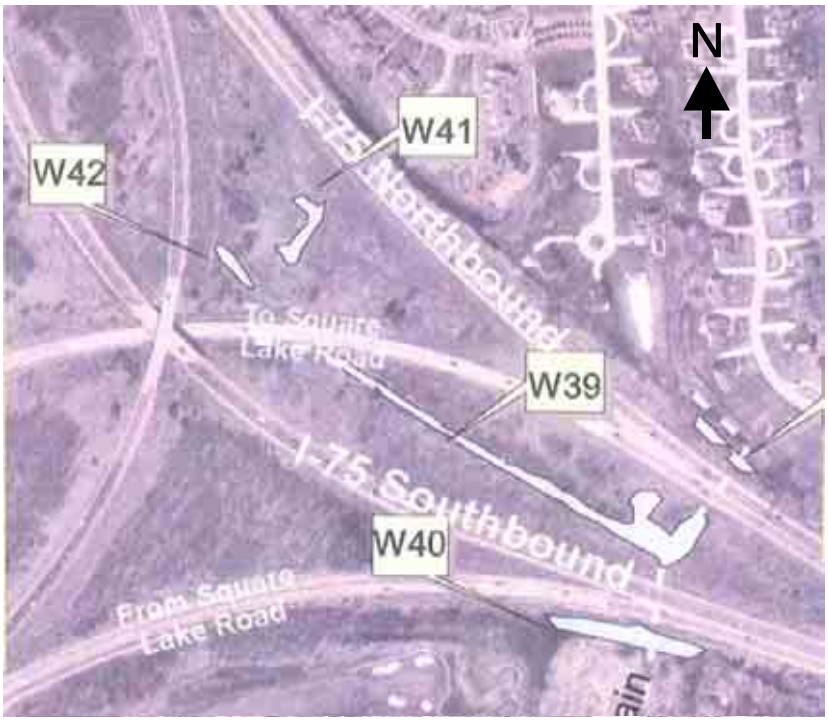
Some changes to the early mitigation concepts discussed in this document may be required as design proceeds. These mitigation concepts will be implemented to the extent possible. Where changes are necessary, they will be designed and field reviewed before permits are applied for or construction begins.

[87] *Regional Landscape Ecosystems of Michigan*, D.A. Albert, 1995.

MDOT is concerned with worker health and safety and will abide by appropriate federal, state and local criteria and guidelines.

These preceding mitigation concepts are based on the best information available through January 2005.

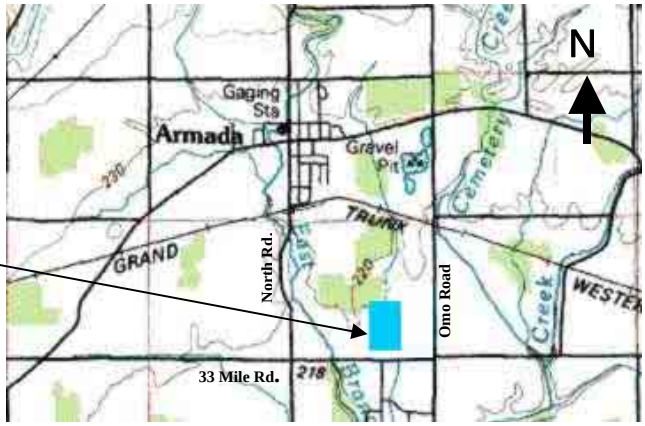
Wetland Impacts at Square Lake Road



Source: Rowe, Inc. and Tilton & Associates

Mitigation Site (in blue)

Source: MDOT



Source: US Geological Service

Figure 5-1
Wetland Impact and Mitigation Sites

SECTION 6
EARLY COORDINATION, PUBLIC MEETINGS, AND SCHEDULE

This section provides an overview of the public and agency input that was vital to the development of the alternatives, the analysis of impacts, the selection of the Preferred Alternative and the measures to minimize harm that have been developed to mitigate project impacts. This section includes: early coordination; the public meetings held during the course of the project that led to the public hearing; comments received from the public at the public hearing and during the comment period and the responses to them; the comments of agencies and other entities and responses to them; and, finally, the subsequent steps that will lead to project implementation.

6.1 Early Coordination

A Notice of Intent to prepare an Environmental Impact Statement was published in the *Federal Register* June 14, 2002 (Appendix C, Section 1). A scoping meeting was held August 29, 2002, in the city of Troy for agencies and local entities. A scoping packet was mailed to those invited prior to the meeting. A listing of those invited, those who attended, and those who responded to scoping materials is found in Appendix C, Section 2. Minutes of the scoping meeting are in Appendix C, Section 3.

Because of the potential for wetland impacts, MDOT initiated the Section 404 Concurrency Process. This process ensures that MDEQ, US EPA, the US Fish & Wildlife Service, and the US Army Corps of Engineers concur with MDOT on the project purpose and need and the practical alternatives to be evaluated in the DEIS. The intent is to get agreement at key points in the process to avoid delays later. As only 0.4 acres of wetland would be affected, the concurrency process was later deemed unnecessary. It is for this reason that there are references to concurrency in the letters from MDEQ dated March 14, 2003, and from US EPA dated May 23, 2003 (Appendix C, Section 4). And, in the letter dated October 17, 2002, the Corps noted that the project was outside their jurisdiction. The US Fish & Wildlife Service made no mention of concurrency in their letter dated March 21, 2003. Letters were sent by FHWA to MDEQ, US EPA, and the US F&WS ending the concurrency process.

Comments received in correspondence from federal and state agencies in response to early coordination are listed below.

6.1.1 Federal Agencies

- U.S. Fish & Wildlife Service – Noted that, "based on information presently available, there are no endangered, threatened, proposed, or candidate species, or critical habitat occurring within the proposed project areas. This presently precludes the need for further action on this project as required under Section 7" of the Endangered Species Act of 1973.
- U.S. Department of the Army, Corps of Engineers, Detroit Division – The Civil Works Program recommended contacting several individuals with respect to planning for the Twelve Towns Drain Environmental Infrastructure Program, including the Corps Project Manager, Pat Kuhne (313-226-6767). The Floodplain Manager recommended avoiding

or minimizing adverse impacts associated with use of floodplain and stressed contact with MDEQ, Land and Water Management Division, Hydraulic Studies Unit (517-335-3181) regarding applicability of a floodplain permit. The Regulatory Office noted that the project is outside the limits of the Corps regulatory jurisdiction for Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act, and that contact should be made with MDEQ, Land and Water Management Division, Permit Consolidation Unit 517-373-9244).

- U.S. Environmental Protection Agency – Encouraged broadening the statement of purpose and need so transit and high occupancy vehicle use could be considered.

6.1.2 State Agencies

- Michigan Department of Natural Resources, Wildlife Division – Noted the project, "should have no impact on rare or unique natural features at the location specified above if it proceeds according to the plans provided."
- Michigan Department of Agriculture – Noted 'little or no adverse impacts to agriculture," but asked that contact be made with Mr. John McCulloch, Oakland County Drain Commissioner (248-858-0958) to avoid impacts to drainage systems.
- Michigan Department of Environmental Quality – Suggested changes to a table related to roadway deficiencies.
- Michigan Department of State, State Historic Preservation Office – Provides concurrence with the Area of Potential Effects (APE) and the recommendations regarding *National Register* eligible properties. Stated that "no historic properties are affected."

6.1.3 Local Agencies

- Road Commission for Oakland County – Supports four lanes on I-75 through Oakland County; believes the lane additions should be for general purpose, not HOV; supports single-point interchange design at both 12 Mile Road and 14 Mile Road; and, noted that it is essential that design review and collaboration take place with their Engineering/Design staff regarding county roads: 12 Mile, 14 Mile, Big Beaver, Long Lake, Crooks, and Adams.

6.2 Public Meetings and Public Involvement

Meetings were held during the course of the study to solicit information from the public, interested groups and agencies. The study has been guided by a Steering Committee comprised of representatives of a number of disciplines within MDOT. An I-75 Council comprised of local elected officials, representatives of community-based organizations and businesses, and interested local citizens also provided significant input. Meeting dates of the I-75 Council and key activities at each are listed below.

- May 22, 2002 – Introduction to the project, schedule, information about the first public meeting.
- July 30, 2002 – Review of transit/HOV methodology, indirect and cumulative methodology, the upcoming scoping meeting, and the second public meeting.
- November 7, 2002 – Results of the transit and HOV analyses.
- March 12, 2003 – Presentation of video summary of project, graphics of preliminary engineering performed to that date, a simulation of noise along the freeway, and a

simulation of how the single-point interchange would operate at 12 Mile Road. This meeting coincided with the public meeting, with the I-75 Council invited to attend.
- June 5, 2003 – Review of project status, capacity analysis, crash study results, and preliminary impact analysis results.
- November 20, 2003 – Review of project status and discussion regarding publication of DEIS and public hearing.

The public was directly involved at all stages, with multiple meetings prior to the public hearing. The mailing list from the I-75 Feasibility Study was carried over to the DEIS. Over 7,000 postcard notifications were mailed about ten days in advance of each meeting. Meeting dates, topics, and issues of interest at each meeting are noted below.

- June 5 & 6, 2002 – Kickoff meeting to introduce the project, discuss the schedule, and solicit initial ideas regarding solutions. Auburn Hills Community Meeting Room and the Viking Ice Arena in Hazel Park. Issues of interest: concern with noise, overweight trucks, notification process, and control of growth; support for transit and park-and-ride. (Total attendance 38 and 11, respectively).
- August 21, 2002 – Preliminary results of the transit and HOV analyses. Troy Public Library. Issues of interest: benefit/cost of proposed project; transit support; air quality; noise; poor bridge conditions; poor arterial conditions; build as quickly as possible. (Total attendance 60).
- March 12, 2003 – Preliminary roadway layout, including 12 and 14 Mile Road interchanges, and noise simulation. Auburn Hills Community Meeting Room. Issues of interest: concern with how long it may take to get lane added, and whether funding would be cut; concern that HOV might add to project cost; concern with noise and support for use of "quiet" pavement; support for other transportation modes; support for motorcycle use of HOV lane. (Total attendance 45).

At the first two meetings, a brief presentation was provided, followed by questions/answers and discussion. Graphics were present at all meetings to allow informed discussions. Comment forms were available at all meetings and collected at the meeting or later by mail. Comments were also solicited and recorded by staff attending the meetings. A toll-free phone number (1.800.GO FIX 75 or 886.463.4975) was available to sign up for mailings and to make any comments. A log of e-mail (the e-mail address is www.mdot.state.mi.us/projects/I-75corridor/) and other correspondence was kept during the course of the project. E-mails and correspondence were responded to promptly. Local officials were visited numerous times to understand the interests and concerns of their constituents. Logs of e-mail and phone calls are on file at MDOT.

During the I-75 Feasibility Study (1999-2000), a private individual prepared position papers entitled "Cycling Mobility: I-75 Corridor, South Oakland County" (February 2000), and, "Cycling Accessibility: I-75 Corridor, South Oakland County" (November 2000). These documents support increased bicycle/pedestrian access across I-75 between 8 Mile Road and M-59, calling for new non-motorized bridge crossings of I-75:

- Between 12 and 13 Mile Roads at Girard Avenue in Madison Heights;
- Between 13 and 14 Mile Roads at Whitcomb Avenue in Madison Heights;
- Between 14 Mile and Maple Roads in Troy;
- Between Livernois Road and Rochester Road near Kirkton Street in Troy;
- Between Big Beaver and Wattles in Troy; and,
- Near the Rouge River to connect Northfield Parkway with Firefighters Park in Troy.

Local officials in Madison Heights and Troy did not mention a need for additional overpasses when they were interviewed for this project in May 2002. Subsequently, the only comment received from these cities was a request from the city of Madison Heights that pedestrian and bicycle access be maintained under the Red Run overpass and a non-motorized path be developed along the east side of I-75 north of Gardenia to 14 Mile Road (see response in next section). This comment was addressed in coordination meetings held with Madison Heights April 15 and October 6, 2004.

6.3 Public Hearing, Public Comments, and Responses

A Public Hearing was held January 27, 2004, at the Troy Marriott Hotel in Troy, Michigan. Approximately 70 people signed in at the public hearing. The numbers of comments received are as follows:

- 19 comment forms turned in at the hearing or received before the close of comments on March 12, 2004.
- 19 people speaking at the public hearing to court recorders
- 42 e-mails
- 3 faxes
- 26 letters from individuals, groups, or public entities
- 12 letters from resource agencies

Full copies of all comments (including the public hearing transcript) can be reviewed at the locations listed in the preface to this FEIS.

It should be noted that a commenter often had multiple comments or issues. Comments were systematically grouped into one of the following classifications:

- Project Support
- Project Opposition
- Legal or Regulatory Requirements
- Purpose and Need
- Alternatives/Evaluation
- Cost/Financing
- Consistency with Planning
- Travel Forecasting/Modeling
- Traffic/Safety
- Business Access
- Pedestrian/Bicycle Access
- Right-of-way
- Air/Health
- Noise
- Visual
- Environmental Justice
- Indirect and Cumulative Impacts
- Sprawl
- Storm Water
- Construction
- Public Involvement
- Miscellaneous

The following pages represent comments received from the general public and a number of organizations. These are organized using the above categories.

Comments received from agencies and government entities are treated separately in Section 6.4. That group of letters includes those from the cities of Troy, Royal Oak and Madison Heights, plus an unsigned draft interdepartmental communication from the City Manager of Ferndale to the Mayor and Council (attached to the letter from SEMCOG).

6.3.1 Project Support

Comment: Supports the lane addition.

Response: Comments acknowledged.

Comment: Supports the HOV lane.

Response: Comments acknowledged.

Comment: Supports the HOV lane for transit use.

Response: Comments acknowledged.

Comment: MichiVan's role should be noted in EIS as promoter of TDM strategies and as fleet manager of vehicles that would operate in HOV lane.

Response: MichiVan has been noted in the FEIS text.

Comment: Business Roundtable Transportation Committee will explore carpooling and vanpooling. Automation Alley supports carpooling and vanpooling.

Response: Additional discussion of carpooling and vanpooling has been added to the FEIS.

Comment: Add a lane to support jobs/economy.

Response: Comments acknowledged.

Comment: Strong support offered by the following: Automation Alley, the Oakland County Executive Office, Oakland County Business Roundtable, Road Commission for Oakland County, Waterford Chamber of Commerce, City of Troy.

Response: Comments acknowledged.

6.3.2 Project Opposition

Comment: Unspecified opposition to project.

Response: Comments acknowledged.

Comment: Unspecified opposition to the HOV lane.

Response: Comments acknowledged.

Comment: Against project braid design due to local traffic impacts in Royal Oak, especially related to Mohawk area or east 4th Street area.

Response: This concern was raised because the braid configuration presented in the DEIS did not allow direct access from I-696 to 11 Mile Road. The modified braid configuration presented in this FEIS maintains this access, eliminating the concern expressed in the above comment.

Comment: How would a 2-person per car peak-hour lane function in this car-loving state?

Response: Two-person HOV lanes prevail in most applications nationwide. Detroit has among the lowest auto occupancies in the nation. It is true, however, that all major cities have low rates. Detroit is not unique. The HOV lanes will encourage carpooling, vanpooling, and bus service by providing a travel time advantage, just as they do in other cities.

6.3.3 Legal or Regulatory Requirements

Comment: The Notice of Intent did not include consideration of the Woodward/Chrysler Freeway Corridor regional or commuter railroad services identified in MDOT's 1997 "Southeastern Michigan Regional Rail Study" or the Chrysler Freeway Corridor commuter rail service or regional rail service option.

Response: The Notice of Intent (NOI) is the first formal step in the EIS process. The NOI should include the description of the proposed action, possible alternatives, the proposed scoping process, the purpose and need for the action, and the contact information for the lead agency, in this case the Federal Highway Administration. The NOI for this study included all of these elements and stated there would be a thorough analysis of transit alternatives and HOV. That analysis has been completed.

Comment: The project does not meet the requirements of Title 23, Section 134 for Metropolitan Planning related to safe and efficient surface transportation systems.

Response: The project does meet these requirements by encouraging the safe and efficient management, operation, and development of surface transportation systems that will serve the mobility needs of people and freight and foster economic growth and development with and through urbanized areas, while minimizing transportation-related fuel consumption and air pollution.

Comment: Council on Environmental Quality regulations were violated: 1) A requested EIS of the entire metro Detroit Chrysler Freeway Corridor was not considered; 2) the availability of the railroad corridor was not evaluated as an alternative; 3) tiering of the EIS should be undertaken.

Response: The regulations were not violated. All reasonable and prudent alternatives were considered. The EIS is for the section of independent utility between M-102 and M-59. The Woodward Corridor was evaluated for transit propensity and while not meeting the purpose and need of the project, was found to be viable for a future transit project. Tiering of the EIS is not appropriate.

Comment: TRU reaffirms its comment on the I-375 EA that a single EIS is needed covering the Chrysler Freeway corridor from downtown Detroit to the north boundary of Oakland County, and includes its comments on the I-375 EA by reference.

Response: MDOT reaffirms its response that it will not combine I-375 and I-75 into one environmental impact statement, as these projects are separated by more than seven miles, and each has logical termini and utility. In the response to the I-375 EA, TRU sought more analysis of air toxics and noted the conformity needs for ozone and particulate matter. There were I-375-specific comments on noise, pedestrian access, cultural resources (Section 4[f]), and parking garages. There was concern for lost opportunity costs from not pursuing a regional transit plan. There was concern about the public participation process, especially the format of the public hearing. TRU indicated the scope of the I-375 project was too narrow; that modeling in support of the project was weak; that rejecting transit was arbitrary and capricious; that anything other than analysis of I-375 with I-75 to the north Oakland County line was segmentation; that an auto solution was contrary to environmental justice; that TRU was excluded from stakeholder meetings; and that an environmental impact statement should be prepared for the I-375 project. Where their comments were not project-specific, TRU's comments on the I-375 Environmental Assessment were virtually the same as those now being made on this DEIS. These comments are addressed by subject area in the following pages.

Comment: TRU recommends that MDOT carry out a Programmatic EIS (PEIS) to evaluate the regional impacts of geographically and generally related transportation projects.

Response: Regional effects are in Section 4.18 of the FEIS. Analysis was provided for public review in the *Indirect and Cumulative Impact Analysis Technical Report*, revised January 2005.

Comment: MDOT has engaged in unlawful segmentation. Traffic drawn or induced to an expanded I-75 will necessitate the need to expand 56 miles of arterials.

Response: The three elements of 23 CFR 771 related to segmentation: logical termini, independent utility, and full consideration of alternatives have been met. The proposed action connects four-lane sections of I-75 to the north and south and all practical alternatives to meeting the purpose and need have been considered. The "56 miles of arterials" are independent regional needs identified in the cumulative impact analysis. Section 4.18 identifies indirect impacts to eight miles of arterials related to the proposed project, but these too have independent utility.

Comment: MDOT's segmentation has precluded the objective consideration of mass transit alternatives.

Response: Segmentation has not occurred, as the Preferred Alternative has independent utility. The mass transit alternative analysis considered rapid transit in the Woodward corridor (parallel to and near I-75) from downtown Detroit to Pontiac, extending beyond the limits of the project in each direction. Modeling of transit in the Woodward corridor found the diversion of trips from I-75 cannot meet the project purpose and need.

Comment: MDOT's persistent pattern of road-based solutions undercuts SEMCOG's ability to make a systemic review of the regions' needs and develop integrated, intermodal solutions.

Response: MDOT's mandate is, in part, to preserve and improve Michigan's trunkline system. MDOT also supports regional transit development, which must have its origin at the local/regional level. The DEIS reports on a multi-modal solution and includes rapid transit in the Woodward Avenue corridor as part of the background network of the entire transportation analysis. HOV implementation will encourage carpooling and transit development and use.

Comment: It is totally inappropriate to design I-75 expansion based on the SEMCOG 2025 Development Forecast or the 2030 Development Forecast. The bias in the predictive land use and transportation models biases in favor of road investment and away from alternatives.

Response: The SEMCOG is the Metropolitan Planning Organization (MPO) for the region. They are responsible through the federal regulatory process for forecasting socioeconomic data and traffic. Their approved model is appropriate for MDOT use.

6.3.4 Purpose and Need

Comment: The DEIS states that inadequate roadway capacity is a need for expanding I-75. This project rejects the opportunity to create a commuter rail link that could serve to reduce VMT.

Response: As stated in Section 2.1, the purpose is "to increase the capacity of the transportation infrastructure in the I-75 corridor to meet travel demand for personal mobility and goods movement." As stated in Section 2.2, the need is "for <u>increased corridor capacity</u>" (emphasis added). Roadway capacity is not specified. Transit was included as part of the background network to assist in reducing vehicle miles of travel.

Comment: MDOT framed a purpose and need that improperly excluded alternatives. MDOT's intent to significantly expand highway capacity through the I-75 corridor is shown in its own Five Year Plan: new access ramps to the Ambassador Bridge; a new interchange at I-375; expanded interchanges at I-94, M-59, and Crooks Road; and other nearby projects.

Response: All reasonable and prudent alternatives were properly considered. Each of the noted projects has been considered in the cumulative impact analysis. MDOT does intend to preserve and expand (where needed) Michigan's Trunkline system.

Comment: MDOT has failed to justify its proposed expenditure in excess of $530 million that further limits transportation options in Metro Detroit and southern Oakland County.

Response: MDOT has properly defined its proposed expenditure, consistent with the SEMCOG's *2030 Regional Transportation Plan* and the project's purpose and need. The widening of I-75 does not limit other transportation options and highlighted the viability of transit in the Woodward corridor.

Comment: The DEIS fails to properly analyze transportation and mobility needs intermodally or at a systems level within the corridor, such as better rail for freight and passenger movement and more transit.

Response: A multi-modal system is defined for the region in the transportation networks used in the DEIS. The Preferred Alternative of a new lane dedicated for use by HOV in peak period hours addresses mobility needs, as the HOV lane will encourage transit and ridesharing, which is available to serve mobility needs, including those without access to their own vehicle. (Section 3.6 and Technical Memorandum 2, *Refined Analysis of Transit and HOV Concepts*).

Comment: The purpose and need fails to take into account important regional planning objectives.

Response: The project is consistent with SEMCOG's *2030 Regional Transportation Plan*.

Comment: The worst congestion along the Preferred Alternative is at the I-696 interchange that ranked only 110 of 144 of the nations' worst traffic bottlenecks, hardly sufficient to justify the project.

Response: The I-696 interchange congestion does not alone justify the project. Since the interchange ranks as a congestion problem of national significance, it is logical to correct the situation. Congestion leads to crashes and safety issues. There is a recognized crash incidence at this location.

Comment: If streets serving an expanded I-75 are not modified, the purpose of expanding I-75 will be negated.

Response: Adding a lane to I-75 will increase the capacity of the corridor, meeting the project purpose and need. As stated in Section 2.1, the purpose is "to increase the capacity of the transportation infrastructure in the I-75 corridor to meet travel demand for personal mobility and goods movement." As stated in Section 2.2, the need is "for <u>increased corridor capacity</u>" (emphasis added). The lack of improvements to other streets will not nullify the increase in capacity, but, as the other streets are improved by local jurisdictions, the entire system will operate better, providing an efficient and safe transportation network.

6.3.5 Alternatives/Evaluation

Comment: A number of comments supported mass transit development, as an alternative to the proposed action, or in addition to it.

Response: The DEIS found mass rapid transit to be viable in the Woodward corridor from downtown Detroit to 9 Mile Road. However, mass transit alone cannot meet the project purpose and need and so was not considered a practical alternative. Transit is an essential part of transportation in the region. The Preferred Alternative will encourage this

Comment: The DEIS did not develop a thorough analysis of transit (as directed by SEMCOG). The EIS bypasses a comparative analysis of alternatives. Reasonable and practicable alternatives, such as transit, are not adequately considered.

Response: A full transit analysis was performed with frequent, high-speed service and an extensive feeder bus network. See, Section 3.6 in this EIS and the *I-75 Corridor Planning/Environmental Study Refined Analysis of Transit and HOV Concepts* (Technical Memorandum No. 2), October 2002. It was found to not be a practical alternative.

Comment: The plan does not include mass transit or HOV.

Response: The DEIS found mass transit to be viable in the Woodward corridor, but cannot meet the project's purpose and need. HOV, which will encourage transit use, is the Preferred Alternative, so the final plan does include HOV lanes for use in the peak hours (approximately 7-9 a.m. and 4-6 p.m.).

Comment: The DEIS shirks factoring how a blend of alternatives could help. A new light rail line in the Woodward corridor may minimize the need to dramatically expand traffic capacity on I-75, rather than simply making interchange improvements and safety enhancements.

Response: A new light rail line in the Woodward Avenue corridor, as defined by regional planning efforts, would not eliminate the need for a full lane addition on I-75 because it would not attract enough trips or divert enough trips. TSM and ITS solutions also cannot alone meet the purpose and need. As stated in Section 2.1, the purpose is "to increase the capacity of the transportation infrastructure in the I-75 corridor to meet travel demand for personal mobility and goods movement." As stated in Section 2.2, the need is "for increased corridor capacity" (emphasis added). TSM and ITS solutions are in place already and are under constant review. These, in conjunction with a new light rail line, fall short of substituting for the I-75 lane addition.

Comment: The project will discourage people from walking and finding alternative means of transportation.

Response: Improved pedestrian linkages across I-75 will offer equal or improved access across the freeway. Table 4-2 lists these bridges, including the six pedestrian bridges that will be reconstructed. All access will be ADA compliant. Implementation of HOV will offer expanded opportunities in the form of ridesharing and buses to those with limited means of transportation.

Comment: Alternatives are limited to those that begin and end within the geographic limits of the highway segment being considered.

Response: This is incorrect. The technical analysis of mass rapid transit was conducted from downtown Detroit to Pontiac. An expanded feeder bus system extending several miles beyond the mass transit system was also included in the analysis. The analysis extended beyond the proposed I-75 project limits at both ends.

Comment: The Transportation Improvement Association supports inclusion of: 1) an HOV lane in peak periods, 2) travel demand management, 3) ITS technology, and 4) para-transit.

Response: Comment acknowledged.

Comment: MDOT should use a "Triple Bottom Line" approach to alternatives evaluation. The DEIS totally bypasses a comparative analysis of alternatives.

Response: The DEIS considered all reasonable and prudent alternatives consistent with the Council on Environmental Quality Guidelines (40 CFR Parts 1500-1508), FHWA's Technical Advisory 6640.8A, and other applicable federal laws and regulations.

Comment: The project does not provide job access for the transit dependent.

Response: Although providing job access for transit dependents was not implicit in the purpose and need, the implementation of the HOV lane will support bus transit development and encourage ridesharing available to transit dependents.

Comment: Failure to invest in transit deprives metro Detroit of economic development opportunities.

Response: Transit investments in the Detroit region are extensive. Development of a rapid transit system will depend, as defined by the federal government, on a locally dedicated funding source to support such a transit component.

Comment: The project should include Single Point Urban Interchanges (SPUIs).

Response: Analysis of SPUIs has found that reconstructing the 14 Mile interchange is the best solution when considering traffic level of service and cost. The 12 Mile Road interchange, as well, is anticipated to operate with the least impact as a reconstruction. However, during the design and value engineering phases, interchange designs such as the SPUI will be reexamined for the 12 Mile interchange.

Comment: The single-point interchange provides no safe haven for pedestrians.

Response: No SPUI has been incorporated in the Preferred Alternative. However, as noted in Section 4.2.2, SPUIs have the advantage of stopping most traffic movements so that pedestrians can safely move. The safety of the pedestrian movement across continuously moving right-turn traffic at ramp ends is a function of the curve radius and traffic control, if any, at these locations.

6.3.6 Cost/Financing

Comment: The cost of the project, combined with the cost of other needed projects is unaffordable.

Response: The project is included in SEMCOG's cost-feasible *2030 Regional Transportation Plan* and, therefore, has been demonstrated to be affordable.

Comment: Money should be spent on existing roads.

Response: The Governor's Fix-it First/Preserve First plan is doing just that. This EIS, however, is funded through completion. The project is scheduled for 2011-2015 in SEMCOG's *2030 Regional Transportation Plan*, after the Governor's plan is complete.

Comment: The cost estimate of half a billion dollars is very low. The DEIS is deficient for not providing a more detailed cost estimate to allow evaluation of opportunity costs.

Response: The cost estimate is based on best early preliminary engineering practices used at this planning stage of project development. It will be refined during subsequent phases, particularly in the design phase.

Comment: I-75 is not a stand-alone project. The DEIS must address arterial street impacts and how costs will be met. The cost to expand the other 56 miles of arterials should be reported in the DEIS. The true cost of expanding I-75 will be closer to $1.5 billion. This project requires additional spending on interchange expansions within and adjacent to the project and sets the stage for expansion of I-75 north.

Response: The proposed project is a stand-alone project with independent utility. As noted in Section 1.2.8, interchange improvements at Crooks/Long Lake and at M-59 have independent utility and are separate projects. The cost of the I-75 project is presented in Section 4.20. The discussion of indirect and cumulative impacts in the FEIS (Section 4.18) covers the referenced 56 miles of arterials.

Comment: The project would drain public money from transit investments.

Response: It is inaccurate to characterize the I-75 project as in competition with transit projects. For example, there have been referenda in Oakland County related to transit development and funding. Transit is an essential part of transportation in the region in conjunction with needed road improvements. The future of highway and transit funds will be determined by a new federal funding authorization bill. A key to major transit investments is the extent to which a local community or region contributes, minimizing the federal share. Major transit initiatives have historically been distinct from other transportation funding.

Comment: More highway lanes means more maintenance cost.

Response: Comment acknowledged.

Comment: The HOV lane will be difficult to enforce for only 4 hours a day. HOV should not be approved without a permanent and dedicated source of funding for proper enforcement.

Response: Peak hour HOV lanes have been implemented in many other states successfully. Dedicated funding and other options, including partnerships, will be coordinated for enforcement activities with the FHWA, MDOT, and local jurisdictions during subsequent phases.

Comment: There is a significant difference in cost between repairing I-75 to its existing design and the full project.

Response: The cost of the reconstruction of I-75 without the lane addition (one in each direction) would be approximately $300 million, compared to $572 million with the lane addition and associated improvements (reconstructing 12 and 14 Mile interchanges, safety improvements at I-696 and M-102, and a new drainage system). With implementation of an HOV lane, the federal funding percentage may be 90 percent rather than the typical 80 percent. In such a case, the non-federal share would be 10 percent of $572 million, or $57 million. The non-federal share with a reconstruction of I-75 without the HOV lane would be 20 percent of $300 million, or $60 million. Therefore, the non-federal share would be less with the Preferred Alternative, than reconstruction without the lane addition.

Comment: MDOT's decision to finance preliminary engineering with Build Michigan III dollars increases the financial burden on local taxpayers.

Response: Comment acknowledged.

Comment: The project will lower property values and reduce Metro Detroit's tax base.

Response: The very minor tax base loss associated with acquisition of private property by government will be recouped by improved access and safety.

Comment: MDOT should carry out a cost-benefit analysis of the proposed I-75 expansion and its alternatives. With the major focus of this project on reduced travel times, no analysis was provided to show the payback in investment in time due to delays caused by construction.

Response: Benefit/cost analysis has been used for specific improvements where one can demonstrate a clear cause/result relationship - such as safety improvements (see *Crash Analysis* The Corradino Group, June 2003). It is difficult and often inaccurate to capture the decision-making process in simple benefit/cost terms, and benefit/cost is not used in such a capacity.

6.3.7 Consistency with Planning

Comment: Michigan's Transportation Vision is not met. The project is not safe, efficient, embracing of all modes, equitable, a good investment for taxpayers, socially responsible, or environmentally responsible.

Response: The "Vision" that emerged from the Transportation Summit held December 2 and 3, 2003, states, "Michigan will lead the 21st century transportation revolution as it led innovation in the 20th century. We will move people and goods with a safe, integrated and efficient transportation system that embraces all modes, is equitably and adequately funded, and socially and environmentally responsible. Michigan's transportation community will work together to ensure that resources are in place to deliver the system." The Preferred Alternative fully meets this vision by providing safety upgrades to 18 miles of freeway, implementing HOV as an alternative to single-occupancy vehicle use, minimizing impacts to the greatest extent possible, and selecting the most environmentally responsible alternative.

Comment: The project does not further SEMCOG's *2030 Regional Transportation Plan* Goals and Objectives (and similar TEA-21 goals) to: enhance accessibility and mobility for all people; enhance accessibility and mobility for freight; enhance community and economic vitality; promote a safe and secure transportation system; and protect the environment.

Response: The proposed widening of I-75 accommodates single-occupancy vehicles, freight, and high-occupancy vehicles in peak periods. The project enhances accessibility and mobility for all who contribute to the economic vitality of the area, while providing a safe transportation system to travel on.

Comment: The project does not satisfy historic goals of the *Greater Detroit Area Freeway Rehabilitation Program* (1990), including a number of issues identified by the City of Detroit relating to low auto ownership in the city, consideration to improvement of parallel surface routes or freeway transit lanes and pursuit of federal funding for fixed rail systems on Woodward and Gratiot.

Response: This project serves Detroiters by improving access to jobs in Oakland County. As noted in Table 4-7, more commuters travel from Wayne County to work in Oakland County than the reverse. Goal #7 of the *Greater Detroit Area Freeway Rehabilitation Program* (1990) is to "strive to maintain the system . . . at no lower than Level of Service E." This project would achieve that goal, while also providing HOV lanes, which facilitate transit on the freeway.

Comment: Conformity must be demonstrated before this project can become a part of the Regional Transportation Plan.

Response: The project is on SEMCOG's conforming *2030 Regional Transportation Plan*.

Comment: MDOT must factor in the increase in VMT that would result from the I-75 expansion in its analysis of air quality impacts.

Response: VMT is accounted for in the analysis performed by SEMCOG to determine conformity with the State Implementation Plan.

6.3.8 Travel Forecasting/Modeling

Comment: The DEIS team did not use mode choice tools. This DEIS has not evaluated shifts to transit because SEMCOG and MDOT do not have a model in place to study the benefits of transit for relieving the congestion burden.

Response: A mode choice model was used in the transit analysis for this study. This is documented in Section 1 of *Technical Memorandum No. 2, Refined Analysis of Transit and HOV Concepts (October 2002).* It has been available for public review since the time of its publication and was a topic of discussion at the November, 2002, I-75 Council meeting and the August 21, 2002, public meeting.

Comment: MDOT's model fails to account for induced travel demand. The transit analysis did not consider induced development of transit investment. Modeling did not include alternative land development trends that transit would support.

Response: US EPA and FHWA have determined that the tools to analyze induced travel are not fully developed at this time. There is no requirement to account for this at this time. The transit analysis, however, did assume high speeds, frequent service, and a supporting bus feeder system to test an optimized mass transit system on the Woodward corridor.

Comment: SEMCOG's forecasting treats the continuous outward land development pattern as an independent variable, however land development is completely dependent on capacities currently available.

Response: SEMCOG uses an approved planning process of small area forecasts that takes into account land use and zoning in each constituent jurisdiction. This becomes the approved land use and trip-making base for the transportation model, approved by FHWA with US EPA review. It should be noted that land development is not "completely dependent" on transportation capacities, since much of the region (Detroit) has roadway capacity but no growth.

Comment: Modeling failed to consider the effect on traffic counts of the Governor's Land Use Council recommendations.

Response: It is speculative to adjust the approved MPO's (SEMCOG) triptable in response to these conceptual initiatives. However, even with a 10 percent reduction in traffic volumes the project would still be needed.

Comment: How can traffic increase when population and employment will reduce between 8 Mile Road and Troy?

Response: There is a substantial amount of travel with origins and/or destinations beyond these points.

Comment: When these projects are undertaken, there will be gridlock. Congestion will not be alleviated and will be aggravated for years. Congestion will increase on 11, 12, & 14 Mile.

Response: Traffic modeling summarized in Table 2-3 and in Figures 2-1 and 2-2 demonstrates this is not so.

Comment: MDOT must address the increase in NAFTA-related international truck traffic.

Response: SEMCOG has conducted truck surveys at key points in the regional network to assist in the forecasting of traffic. That analysis is taken into account in building the regional trips tables used in the modeling effort.

6.3.9 Traffic/Safety

Comment: The project will improve safety.

Response: Comment acknowledged.

Comment: The study leaves ten-foot shoulders on the inside. Are there alternatives in the existing right-of-way?

Response: The ten-foot median shoulders meet current design standards. Construction of a wider shoulder of 12 feet was studied. It was determined that such shoulders would result in increased impacts in the form of acquisitions/relocations (Section 3.7.3), the cost of which could exceed an additional $100 million. It was not considered a practical alternative.

Comment: The study leaves the dangerous "S" curve in Hazel Park.

Response: The study analyzed “straightening” the “S” curve in Hazel Park. To do this, 150 parcels, including 100 residential structures, 20 business structures, a church, and an elementary school (Section 3.7.2) would be impacted. The cost would exceed $100 million. The significant impacts to the community and cost made it an impractical design alternative.

Comment: Adding a lane will increase crashes.

Response: According to FHWA *Highway Statistics*, urban freeways have a lower crash rate than arterial streets. As traffic diverts from surface streets to freeways, overall crash totals are expected to decline.

Comment: The 4th Street ramp shift will increase local traffic on several north-south streets at the east end of 4th Street.

Response: The 4th Street ramp shift proposed in the DEIS was studied further and coordination occurred with the city of Royal Oak. The result is that access from 4th Street will continue to be allowed and the layout at the access point will be improved.

Comment: The inability to exit from I-696 to 11 Mile Road with the proposed braid will shift harmful amounts of traffic to the Mohawk area. The public is outraged at having to divert a few blocks around us on Mohawk.

Response: After the comments were received, additional analysis was conducted and local coordination occurred. The DEIS braid design was modified so that access from I-696 to 11 Mile Road is maintained. Therefore, there will be no shifts of traffic to the Mohawk area.

Comment: Crash rates may go up. The driving option is more dangerous. The safety impacts on the aging have not been considered. Higher speeds and level of service will result in more crashes with greater severity.

Response: Crash rates will not go up (Section 2.2.6). The elderly will benefit, as will all travelers, from the crash countermeasures that are proposed as a part of the project.

6.3.10 Business Access

Comment: Traffic diverted from 11 Mile will hurt businesses.

Response: The modified braid design presented in this FEIS allows exiting to 11 Mile Road. The opportunity will also exist for local residents to turn at Lincoln Avenue as the ramp will shift to the south to allow this movement.

6.3.11 Pedestrian/Bicycle Access

Comment: MDOT's I-75 project significantly interferes with pedestrian access within the I-75 corridor, which will have serious health consequences.

Response: Table 4-2 demonstrates that pedestrian access across I-75 will be improved along the corridor. When the five pedestrian bridges in Hazel Park and the one in Madison Heights are replaced, they will meet the guidelines of the Americans with Disabilities Act (ADA). Current guidance calls for more extensive ramps (which in several locations in the corridor will require property acquisition and relocations, see Section 3.7.1). Future guidance may offer the option of elevators. MDOT will continue to study the most appropriate ways to comply with ADA and will incorporate those elements into design.

6.3.12 Right-of-Way

Comment: There is a new house at 26091 Hampden.

Response: Comment acknowledged.

Comment: A business owner has a concern regarding the taking of the business' parking lot, and details of design.

Response: These issues will be coordinated during right-of-way acquisition and design, which is anticipated to be several years away.

6.3.13 Air/Health

Comment: The project will improve air quality.

Response: Comment acknowledged.

Comment: The study was not thorough on air pollution. Air pollution from cars and trucks is a major health hazard. MDOT must address the increase in toxic air pollutants. The DEIS ignores, underestimates, or miscalculates impacts on human health and the environment. NEPA requires MDOT to carry out a corridor health study, including research evidence identified in EPA's Criteria Document (on particulate matter). Health concerns should stop the project.

Response: Sufficiently reliable analytic methods are not available to provide credible estimates/forecasts of air toxics impacts on human health. The National Environmental Policy Act (NEPA) does not require such epidemiological health studies to be conducted. The air quality analysis conducted was in compliance with NEPA and other federal environmental law. It should be noted, however, that air quality is improving and will continue to do so as vehicles in operation in the study area, built to meet continually more stringent air quality controls, continue to populate the fleet.

Comment: A more detailed analysis of particulate matter must be done. Impacts to asthma sufferers should be considered in more detail. There should be a greater effort to examine data and research on health and proximity to freeways.

Response: Unfortunately, sufficient reliable methods are not available to provide credible estimates/forecasts of particulate matter's impacts on human health. They are not required as a part of the NEPA process at this time.

Comment: The DEIS does not propose appropriate mitigation. What measures would be taken to abate air pollution?

Response: No air quality standards are violated, and the project is listed on SEMCOG's conforming, cost-feasible *2030 Regional Transportation Plan*. By the time the project is constructed on-road and off-road (construction) vehicles will meet more stringent air quality standards, and diesel fuel will be substantially cleaner. Standard mitigation with respect to maintenance of traffic (Section 5.10), dust, and bituminous and concrete mixing plants (Section 5.13) will be adhered to.

Comment: MDOT must verify that the cold start default average is appropriate.

Response: The US EPA and FHWA review and approve modeling assumptions related to conformity made by SEMCOG, the regional Metropolitan Planning Organization. SEMCOG's assumptions have been reviewed and approved by both agencies.

Comment: MDOT needs to use proper mixing heights and surface roughness factor in the air quality analysis.

Response: Mixing heights and surface roughness factors used are consistent with those recommended in documentation accompanying the CAL3QHC model. Details of the air quality analysis are available in the *Air Quality Impact Analysis Technical Report*, October 2003.

Comment: The model needs to include receptor grids near locations that are likely to serve traffic during peak hours originating within a fifteen-minute drive of the project area.

Response: Receptors were positioned consistent with the best practices for such air quality analysis. Receptors represent locations where humans are likely to be present for at least an hour. As Section 4.7 indicates, over 50 receptors were modeled at 11 locations that were considered to be most sensitive to traffic effects. All estimated values were well within National Ambient Air Quality Standards.

Comment: Increasing travel speeds by adding capacity actually increases CO and VOC emissions (citing data from MOBILE5a and EMFAC7F models).

Response: Newer data have changed the speed vs. emission factor curves, especially for newer vehicles and future years (*Sensitivity Analysis of MOBILE6.0*, EPA-420-R-02-035, December 2002). A key factor in the creation of air pollutants by mobile sources is to reduce stop-and-go travel, which occurs when capacity is limited and congestion occurs. An additional lane reduces the amount of delay related to incidents as it helps traffic pass an incident and allows traffic to move more smoothly and efficiently. With the lane devoted to HOV use ridesharing is increased and average auto occupancy improves.

Comment: The DEIS refers to the need to obtain air quality permits from Wayne County. This permitting is now performed by the Michigan Department of Environmental Quality.

Response: Comment acknowledged. The reference has been changed.

Comment: The DEIS fails to address increased energy consumption and potential increases in emissions of greenhouse gases from mobile sources.

Response: Analysis of greenhouse gases is not required on a project-level basis.

6.3.14 Noise

Comment: Please provide a graphic showing noise changes at the next public meeting. Will there be noise walls and where?

Response: Graphics displayed at the public hearing (and earlier at a public meeting held March 12, 2003), in the DEIS (Figure 4-5), and in this FEIS (Figure 4-5), show the location of proposed noise walls. The text (Section 4.8.5) provides extensive documentation of why areas did, or did not, qualify for consideration of noise abatement. Three locations changed due to

changes in the MDOT Noise Policy. These are listed in Table 4-14. Walls 17 and 18 became reasonable as the length restriction that was earlier included in the Policy was removed. Wall 5 was no longer considered reasonable as there are no benefiting residences to go along with the school. Please refer to the updated *Noise Study Report* available upon request.

Comment: The study was not thorough on noise pollution. The DEIS does not accurately disclose increases in noise pollution or propose appropriate mitigation.

Response: Increases in noise levels were documented in the DEIS. Modifications to the braid and changes in the Noise Policy resulting in an updating of the *Noise Study Report* and Section 4.8.5 of this FEIS. Eighteen noise walls totaling 4.9 miles in length are proposed.

Comment: Will Northfield Hill subdivision get a noise wall?

Response: Yes. See Section 4.8.5 and Figure 4-5d. Wall 16 (0.4 miles long) and Wall 18 (0.1 miles long) as listed in Table 4-14 would provide mitigation to Northfield Hill subdivision.

Comment: Aesthetically pleasing noise walls must be included along with treatment to individual homes not protected by noise walls. Noise wall design materials, cost, maintenance and jurisdiction must be identified.

Response: A series of criteria must be met for consideration of noise abatement (see Table 4-12, FHWA Noise Abatement Criteria). Typically, individual homes do not meet the adopted criteria. Determinations regarding the appearance of walls will result from future meetings with property owners in the sections eligible for such walls in the design phase of the project. Meanwhile, the context sensitive design process would invite local municipal officials to share their views on the overall project design.

6.3.15 Visual

Comment: How high will the ramp braid be?

Response: The ramp braid connecting I-696 to northbound I-75 would be at ground level. The off ramp from northbound I-75 to the service drive would pass underneath, below ground level.

6.3.16 Environmental Justice

Comment: The DEIS does not appropriately evaluate environmental justice implications or mitigate disparate adverse impacts on minority and low-income populations.

Response: The impacts to minority and low-income populations are not disproportionately high and adverse (see Section 4.3). The project will maintain access to jobs and support transit development and ridesharing opportunities for those with limited access/use of an automobile. A continuing effort will be made to identify disproportionately high and adverse impacts to minority and low-income populations during subsequent phases of this project. If such effects are

identified, every effort will be made to actively involve minority or low-income populations in the project development process, and to avoid or mitigate any potential disproportionately adverse impacts that may result.

6.3.17 Indirect and Cumulative Impacts

Comment: There is no discussion of the cost and impacts of the 56 miles of arterial lane additions.

Response: Analysis is presented in Section 4.18 of this FEIS. Details are provided in the *Indirect and Cumulative Impact Analysis Technical Report*, January 2005. Table 4-23 provides information on the impacts and costs related to these projects.

Comment: The DEIS fails to give adequate consideration to the social and economic costs and ramifications of the expansion of I-75 and the multiple societal social and economic problems that could begin to be solved by recommending alternatives as priorities.

Response: The EIS recommends implementation of actions that address the project's purpose and need and examines the social and economic impacts of those actions. The EIS has addressed a full range of alternatives, including transit and Transportation System Management (TSM). SEMCOG and its constituent members continue to examine a full range of transportation modes for Southeast Michigan.

Comment: The DEIS ignores, underestimates, or miscalculates the economic impact.

Response: Economic issues are covered in Section 4.4 of this FEIS. Data show Oakland County to be the leading job producing area in Michigan. The Preferred Alternative responds to the growth in the county. Changes is State Equalized Value indicate that growth has occurred along the entire length of the Preferred Alternative. Direct tax base effects have been accurately estimated. The anticipated continued growth in the tax base substantially exceeds estimated losses due to the potential property acquisition for the project.

Comment: MDOT has ignored the cumulative impacts and the (lost) opportunity costs of investing the large sum of public dollars for so little economic benefit to the entire region. MDOT has failed to consider the cumulative impact of the proposed project along with other past, present, and reasonably foreseeable future actions, including the widening to the north Oakland County line of I-75 and other highway projects, such as I-94, and I-375, and, initiatives to implement transit and commuter rail in the I-75 corridor from downtown to at least Pontiac.

Response: The indirect and cumulative analysis is presented in Section 4.18 of this FEIS. Details are provided in the *Indirect and Cumulative Impact Analysis Technical Report*, January 2005.

Comment: For cumulative impact analysis the DEIS needs to develop a mitigation plan for the environmental impacts of the entire plan, including arterial road changes.

Response: The FEIS addresses impacts due to the freeway improvement. It is up to the implementing agencies to define mitigation at the time each of these independent projects undergoes its environmental review within its respective jurisdiction.

Comment: There is an inadequate summary of indirect impacts. The agency has failed to meet the "hard look" standard (for indirect and cumulative impacts) that requires more than general information or reference to other documents, sufficient to let courts and the public make a reasoned decision of the anticipated impacts.

Response: Federal guidance states " . . . the continuing challenge of cumulative effects analysis is the focus on important cumulative issues, recognizing that a better decision, rather than a perfect cumulative effect analysis, is the goal of NEPA." The FEIS is in compliance with this guidance. The FEIS Section 4.18 Indirect and Cumulative Impacts has been substantially expanded, drawing from the revised *Indirect and Cumulative Analysis Technical Report* (January 2005).

Comment: The secondary air quality impacts of this project are not addressed in the DEIS.

Response: The secondary air quality effects are accounted for in SEMCOG's conformity analysis performed for projects in its cost-feasible *Regional Transportation Plan*.

6.3.18 Sprawl

Comment: This project promotes sprawl. The project will encourage people and jobs to move out into northern Oakland County.

Response: Existing travel demand is being served poorly, and travel demand will increase. The project responds to the defined purpose and need. It will serve the existing and growing travel demand. The multiple reasons for that demand and its relationship to sprawl are addressed in the *Indirect and Cumulative Impact Analysis Technical Report*, January 2005, in the section entitled "Regional Issues."

6.3.19 Storm Water

Comment: The cost of the impact of storm water hasn't been addressed. The DEIS does not provide detail of how separation of storm water system affects Madison Heights.

Response: I-75 storm water now flows into a combined sewer system (meaning storm water mixes with sewage in one set of pipes) that flows to the Detroit treatment plant via the Twelve Towns Combined Sewer Overflow system. The Preferred Alternative will separate these flows, thus reducing the potential for overflow of sewage into the Red Run Drain during storm events. The storm water would be redirected to the Red Run drain downstream of the Twelve Towns Combined Sewer Overflow system. During normal flow periods, the Red Run drain can accommodate this flow. During storm events, I-75 storm water would continue to go to Red Run drain as it does today, but it would not mix with sewage that flows to Red Run Drain today under overflow conditions via the Twelve Towns Combined Sewer Overflow system. The preliminary

cost estimate for the changes to the storm water system is $11 million and is included in overall project costs.

Comment: The DEIS does not accurately disclose increases in water pollution or propose appropriate mitigation.

Response: See the above response. The separation of I-75 storm water from the combined sewer system means that there will be less water pollution due to combined sewer overflows. Overflows occur when the combined system is overwhelmed by storm water. When the I-75 storm water is removed from the system, there will be fewer overflows. However, by diverting I-75 runoff from the combined system, there is the potential for increased amounts of pollutants from road runoff to be discharged, but this will be mitigated through installation of Best Management Practices to the maximum extent practical. Standard MDOT mitigation practices are detailed in Sections 5.3.and 5.9 of the EIS.

6.3.20 Construction

Comment: Where is the planning for transit as mitigation during construction? MDOT should use Construction Traffic Maintenance and Congestion Mitigation and Air Quality Improvement Program (CMAQ) funding to finance transit in advance of and during construction. The DEIS is deficient for not having proposed a specific plan such as this.

Response: Planning for transit as mitigation during construction has been outlined in the FEIS in Section 4.2.4. A funding plan will be developed in later phases of the project. Many funding sources will be considered for use.

Comment: The DEIS does not discuss the potential duration of construction, its phasing or reasonable opportunities for transit investment as a tool for congestion management. Without this information it is impossible to assess the construction impacts on host communities, and their economic viability.

Response: Construction phasing will be developed further in the design and value engineering phases of this project. Adding a lane in each direction is expected to take approximately four construction seasons, once all right-of-way has been acquired and the design has been approved. Local coordination will occur with adjacent communities in order to minimize construction impacts. The project is now listed on SEMCOG's *2030 Regional Transportation Plan* for the 2011 to 2015 time period. It should be noted that the design portion of this project has been deferred to the Governor's Preserve First Program. Construction funding has not been identified for this project.

Comment: Detours will cause enormous negative impacts on the residences and businesses along Woodward. There is no plan to handle traffic and disruptions during the multiple years of construction.

Response: An analysis of traffic shifts to Woodward Avenue during construction of the I-75 project was conducted for the Environmental Assessment prepared for the M-1/M-102 Project. Analysis showed that Woodward Avenue would handle the traffic without significant congestion

or safety issues. However, details of detour routes will be coordinated locally during the design phase of this project in order to minimize impacts to the greatest extent possible. It should be noted that the lane addition makes maintenance of traffic easier because another lane is available into which traffic can be diverted.

Comment: The community must be protected from adverse air quality impacts during construction. Construction and related off-road vehicles are for the most part unregulated.

Response: Details of mitigation of air quality during construction are found in Section 5.13. As announced May 10, 2004, EPA is implementing more stringent emission rules for off-road vehicles and fuels. These mandatory rules will be in effect prior to the construction of the I-75 project.

6.3.21 Public Involvement

Comment: MDOT subverted public participation by too narrowly defining stakeholders.

Response: Section 6.2 covers the extensive public involvement program, leading to the public hearing; three sets of public meetings and five meetings of the I-75 Council, comprised of local elected officials, representatives of community-based organizations and businesses, and interested local citizens. The meetings were all open to the public. The mailing list for meeting notification exceeded 7,000 by the time of the public hearing. Members of the public and organizations came and participated in all these meetings. Additionally, a free “800” telephone hotline number has been available for calls; the project Web site has been continuously updated, including information on upcoming meetings and the I-75 Council minutes; and, the opportunity to e-mail MDOT with questions and comments has been available since the project’s beginning.

Comment: MDOT's public participation process was inadequate because the agency failed to hold a "town hall" style public hearing.

Response: Public participation was conducted in a manner consistent with the FHWA-approved process. It reaches many people and provides a multitude of opportunities to contact the study team and comment on the study. Study team members were available at all meetings to answer questions on an individual basis. The format was designed to effortlessly reach more people, as some are intimidated by the public speaking format.

6.3.22 Miscellaneous

Comment: There should be transit funding for the disabled.

Response: Comment acknowledged.

Comment: MDOT should examine the potential for or institute HOT lanes.

Response: HOT lanes are high occupancy toll lanes. The concept is to offer the option to the public of using the HOV lane for a fee. It should be recognized that in practice, HOT lanes are generally implemented when HOV lanes are barrier-separated from general traffic flow and

are only established after the rate of use of an HOV lane is known from actual experience. HOT lanes also require a substantial capital investment and an oversight agency with tolling authority. MDOT will construct HOV lanes. If, in the future, HOT lanes seem to be a viable alternative, they will be studied.

Comment: Truck-only lanes should be considered.

Response: I-75 through the study area has a relatively low percentage of trucks, especially during peak periods. A truck-only lane would not be a cost-effective alternative for the freeway.

Comment: What is the effect on Holly? Are there plans to widen I-75 to Holly?

Response: Residents of the Holly area will benefit from reduced congestion, if they use I-75 south of M-59. MDOT does plan to study I-75 further north, but the schedule for such widening is unfunded and unknown at this time.

Comment: Add a lane all the way through Oakland County. Add interchange at Clintonville.

Response: The *I-75 Corridor Study in Oakland County* (November 2000) recommended adding a lane through Oakland County. The same study concluded that an interchange at Clintonville Road did not have sufficient public support to pursue it. An additional study from M-59 north to the county line will need to be conducted to determine the need of a lane.

Comment: I am against the I-75/Long Lake Road interchange.

Response: The I-75/Long Lake Road interchange is an independent project not covered by this EIS.

Comment: Slotted barriers should be used to protect small animals and for visual appeal. Higher fences would protect deer, and smaller mesh fences would protect small animals.

Response: Comment acknowledged.

Comment: The Square Lake interchange should be the top priority.

Response: A lane addition for northbound I-75 through this interchange was implemented in the summer of 2002. Additional changes are under construction now, modifying lane use from north- and southbound I-75 to Square Lake Road.

Comment: The DEIS fails to provide adequate mitigation for impacts it does acknowledge.

Response: Specifics of mitigation are covered in Section 5 of the FEIS.

6.4 Agency Comments and Responses

Comments were provided to MDOT through interagency coordination resulting from the circulation of the DEIS. Table 6-1 lists agencies that received the DEIS and those that commented, with the date of the response. This section presents each of the letters and follows with responses to the questions and comments.

Table 6-1
Agencies Sent DEIS Copies and Comments Received

	Comments	
	Requested	**Received**
Federal Agencies		
US Department of Agriculture, National Resource Conservation Service	X	December 31, 2003
US Department of Commerce, Environmental Affairs	X	January 29, 2004
US Department of Energy, Washington Office	X	
US Department of Health & Human Services, Centers for Disease Control	X	
US Department of Housing and Urban Development, Area Director	X	
US Department of Interior, National Parks Service	X	
US Department of Interior, Office of the Secretary		March 10, 2004
US Department of Interior, US Fish & Wildlife Service	X	
US Department of Transportation, Federal Transit Administration	X	
US Environmental Protection Agency, Region V	X	February 23, 2004
US Environmental Protection Agency, EIS Filing Station, Washington	X	
State Agencies		
Department of Agriculture	X	January 20, 2004
Department of Community Health	X	
Department of Environmental Quality	X	February 17 & 27, & December 21, 2004
Department of Natural Resources	X	
Department of State, State Historic Preservation Office	X	February 20, 2004

Table 6-1 (continued)
Agencies Sent DEIS Copies and Comments Received

	Comments	
	Requested	**Received**
Local Jurisdictions, Agencies, Interested Groups, and Elected Officials		
Clean Water Action	X	
Michigan Environmental Council	X	
Michigan United Conservation Clubs	X	January 28, 2004 [a]
Sierra Club	X	
Traffic Improvement Association of Oakland County	X	January 28 & March 2, 2004 [a]
Auburn Hills	X	
Bloomfield Township	X	
Detroit	X	
Ferndale	X	At Public Hearing and in SEMCOG's submittal [b]
Hazel Park	X	
Madison Heights	X	March 9, 2004
Royal Oak	X	March 1, 2004, March 2, 2004 & March 7, 2005
Troy	X	March 1, 2004
Oakland County	X	
Oakland County Conservation District	X	
Oakland County Drain Commission	X	January 30, 2004
Oakland County Emergency Management	X	
Oakland County Health Department	X	
Oakland County Sheriff's Department	X	
Oakland County Soil Conservation District	X	
Road Commission for Oakland County	X	January 15 & 27, 2004
Southeast Michigan Council of Governments	X	February 23, 2004
SMART	X	January 27, 2004
Wayne County Department of Public Services	X	
State Senator Michael D. Bishop, District 12	X	
State Senator Shirley Johnson, District 13	X	
State Senator Gilda Z. Jacobs, District 14	X	
State Representative David T. Woodward, District 26	X	
State Representative Andy Meisner, District 27	X	
State Representative Clarence Phillips, District 29	X	
State Representative Shelly Goodman Taub, District 41	X	
State Representative John G. Pappageorge, District 41	X	
US Senator Carl Levin	X	
US Senator Debbie Stabenow	X	
US Representative Joe Knollenberg	X	
US Representative Sander Levin	X	

Source: The Corradino Group of Michigan, Inc.

[a] The comments in these letters are addressed in Section 6.3.

[b] This draft interdepartmental communication from Ferndale was attached to SEMCOG's letter and is addressed in Section 6.4.13.

Letter 1 **December 31, 2003, United States Department of Agriculture, Natural Resources Conservation Service**

USDA

United States Department of Agriculture

Natural Resources Conservation Service

Michigan State Office

3001 Coolidge Road, Suite 250 East Lansing, MI 48823-6321
(P) 517-324-5270
(F) 517-324-5171
www.mi.nrcs.usda.gov

December 31, 2003

Ms. Margaret M. Barondess, Manager
Environmental Section
Project Planning Division
Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

RE: Draft Environmental Impact Statement (DEIS) for the Widening and Reconstruction of I-75 from M-102 to M-59

Dear Ms. Barondess:

We have reviewed your DEIS for the widening and reconstruction of I-75 from M-102 to M-59. It is anticipated that there will be no negative effects on prime and unique farmland since the proposed project alternatives will be completed on soil areas that have already been converted to urban uses. 1-1

Thank you for the opportunity to comment.

Sincerely,

Stephen S Davis acting for

RONALD C. WILLIAMS
State Conservationist

cc:
Albert Jones, ASTC for Field Operations, NRCS, Flint, Michigan

NRCS Natural Resources Conservation Service

The Natural Resources Conservation Service works in partnership with the American people to conserve and sustain natural resources on private lands.

An Equal Opportunity Provider and Employer

6.4.1 US Department of Agriculture – Letter 1

Response 1-1: Comment acknowledged.

Letter 2 **January 29, 2004 – United States Department of Commerce, National Oceanic and Atmospheric Administration, National Geodetic Survey**

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
PROGRAM PLANNING AND INTEGRATION
Silver Spring, Maryland 20910

January 29, 2004

Ms. Margaret M. Barondess, Manager
Environmental Section
State of Michigan, Dept. of Transportation
Murray D. Van Wagoner Building
PO Box 30050
Lansing, MI 48909

Dear Ms. Barondess:

Enclosed are comments on the Draft Environmental Impact Statement for Proposed Widening and Reconstruction I-75 from M 102 to M 59 Oakland County, Michigan. We hope our comments will assist you. Thank you for giving the opportunity to review this document.

Sincerely,

Susan A. Kennedy
Acting NEPA Coordinator

Enclosure

Printed on Recycled Paper

Letter 2, continued

MEMORANDUM FOR: Susan A. Kennedy
Acting NEPA Coordinator

FROM: Charles W. Challstrom
Director, National Geodetic Survey

SUBJECT: DEIS-0312-06 Proposed Widening and Reconstruction I-75 from M 102 to M 59 Oakland County, Michigan

The subject statement has been reviewed within the areas of the National Ocean Service (NOS) responsibility and expertise and in terms of the impact of the proposed actions on NOS activities and projects.

All available geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the National Geodetic Survey's home page at the following Internet World Wide Web address: http://www.ngs.noaa.gov After entering the this home page, please access the topic "Products and Services" and then access the menu item "Data Sheet." This menu item will allow you to directly access geodetic control monument information from the National Geodetic Survey data base for the subject area project. This information should be reviewed for identifying the location and designation of any geodetic control monuments that may be affected by the proposed project.

If there are any planned activities which will disturb or destroy these monuments, NOS requires not less than 90 days' notification in advance of such activities in order to plan for their relocation. NOS recommends that funding for this project includes the cost of any relocation(s) required. 2-1

For further information about geodetic control monuments, please contact Galen Scott; SSMC3 8620, NOAA, N/NGS; 1315 East West Highway; Silver Spring, Maryland 20910; Telephone: 301-713-3234 x139; Fax: 301-713-4175, Email: Galen.Scott@noaa.gov.

6.4.2 US Department of Commerce, National Geodetic Survey – Letter 2

Response 2-1: The 90-day advance notice has been added to the mitigation section, Section 5.15.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

March 10, 2004

ER 04/37

Mr. James J. Steele, Division Administrator
Federal Highway Administration – Michigan Division
Federal Building, Room 207
315 West Allegan Street
Lansing, Michigan 48933-1528

Dear Mr. Steele:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (EIS) for the Proposed Improvements to I-75 between M-102 and M-59, Oakland County, Michigan. The Department offers the following comments for your consideration.

GENERAL COMMENTS

The document provides an analysis of potential impacts to federally listed species, water quality, and wetland resources. The analysis suggests the project will have limited impacts to natural resources, as little fish and wildlife habitat occurs within the project limits.

The DEIS describes three practical alternatives: No Build, addition of a 4th general-purpose lane under the General Purpose (GP) Alternative, or addition of a 4th lane as a high occupancy vehicle lane under the HOV Alternative. The No Build and GP Alternative would have no impacts on wetlands, whereas the HOV Alternative would impact an estimated 0.41 acres of wetlands.

SPECIFIC COMMENTS

Fish and Wildlife Resources

Section 4.9, Threatened and Endangered Species, pages 4-48 and 4-49: Based on input from the U.S. Fish and Wildlife Service (FWS), the DEIS concludes that no federally listed threatened or endangered species or species proposed for listing are found in the I-75 corridor where construction is proposed.

If new information about the project becomes available that indicates listed or proposed species may be present and/or affected or should other species occurring in the project area become federally listed or proposed, a reevaluation of project impacts should be conducted. Because data on threatened and endangered species are updated continually, we recommend that the Michigan Department of Transportation request from the FWS an updated list of federally

3-1

endangered, threatened, or proposed species that may occur in the project vicinity, if project initiation extends beyond six months of this letter. 3-1

Water Quality and Wetland Resources

Section 4.10 Surface Water Features/Water Quality/Floodplains, pages 4-49 to 4-55: The DEIS indicates that the project may cross several surface water features, including a number of named and unnamed drains, as well as the River Rouge. The DEIS concludes that "most waterways, drains, and ditches will not be affected by construction associated with the build alternatives because construction of the additional lane will be in the median and most of the culverts extend, uninterrupted, beneath the roadbed with no break at the median." Mitigation measures for potential impacts on biological communities where the I-75 project crosses the River Rouge (between Coolidge Highway and Crooks Road and at Squirrel Road) include avoidance of work in the channels of the River Rouge or other water courses during the periods of seasonally high water, except as necessary to prevent erosion (Mitigation measure #1, Section 5.3 Soil Erosion and Sedimentation Control, pages 5-2 and 5-3). We recommend that any work in the channels of Rouge River be avoided at all times, regardless of flow level, except as necessary to prevent erosion. 3-2

Section 4.11 Wetlands, pages 4-55 to 4-58: Forty-one wetlands were identified within the proposed highway right-of-way. The DEIS indicates that impacts to wetlands would only occur with the HOV Alternative. The GP Alternative would not affect any wetlands. Under the HOV Alternative, two wetlands, W39 and W41 would be impacted. Both wetlands are a mix of scrub-shrub and emergent (PSS/PEM). Wetland W39 is rated priority 2, and wetland 41 is rated priority 3. If the HOV Alternative is chosen, a total of 0.41 ac (0.25 ac of W39 and 0.16 ac of W41) would be impacted. The DEIS concludes that these areas would be subject to mitigation, with a mitigation need of approximately 0.61 acres.

Section 5.14 Wetland Mitigation, pages 5-8 to 5-10: The DEIS identifies one mitigation potential site. However, a recent letter from the Michigan Department of Environmental Quality (MDEQ, dated February 14, 2004) indicates the agency has not agreed to the use of the proposed site for mitigation of the 0.41 ac of wetland that would be impacted. Should the HOV Alternative be chosen, we concur with MDEQ that further evaluation of the proposed mitigation site is needed. 3-3

We recommend that the proposed mitigation and monitoring plan, which should be included in the Final EIS, include the following additional items: 3-4

- A commitment to restore or create replacement wetland habitat before highway construction begins;
- A commitment to monitor the success of the replacement wetland habitat following its construction for a minimum period of 5 years, including a specific timetable for monitoring that includes timing and frequency of sampling;
- Identification of performance criteria for measuring the success of wetland habitat restoration or creation;

3

- A commitment to correct or improve the biological productivity of restored or created wetland habitat based on the results of monitoring;
- Site plans that include a 100-foot perimeter buffer zone adjacent to the wetland mitigation site;
- Submittal of annual monitoring reports; and
- Establishment of protection and management plans, to remain in force in perpetuity, for the wetland mitigation area.

Section 4.18, Indirect and Cumulative Effects, pages 4-63 to 4-67: The DEIS discusses potential indirect and cumulative effects of the project on natural resources, particularly parks and wetlands. The DEIS states that indirect effects of the project may include impacts to 0.6 acres of wetland near Clinton River and one park. In consideration of cumulative impacts, the DEIS states that 8 acres of wetland could be affected and 7 parks would be subject to review for impacts as a future effect of widening I-75. These are considered separate actions which would require additional permits from MDEQ.

FISH AND WILDLIFE COORDINATION ACT COMMENTS

The Department's comments do not preclude separate evaluation and comments by the FWS, pursuant to the Fish and Wildlife Coordination Act, regarding any permits required from the MDEQ and/or the Army Corps of Engineers for work in wetlands and other waterbodies. In the review of any required permit application(s), the FWS may concur (with or without stipulations) or object to permit issuance, depending upon whether specific project-related actions may impact public trust fish and wildlife resources. The FWS advises that it would likely not oppose issuance of required permits provided that the project design and other measures described in the EIS to avoid impacts are incorporated into the final project plans and that the final plans also include adequate measures (including those described above) to offset unavoidable wetland impacts. Please continue to coordinate with the FWS during the refinement of the wetland mitigation plans.

We appreciate the opportunity to provide these comments.

Sincerely,

Michael T. Chezik

Michael T. Chezik
Regional Environmental Officer

6.4.3 US Department of Interior – Letter 3

Response 3-1: Many six-month periods will pass prior to project initiation. MDOT keeps up-to-date on endangered species listings and will have updated lists to refer to when the project commences.

Response 3-2: The south crossing of the River Rouge between Coolidge Highway and Crooks Road (Sprague Drain) is contained in twin 9 x8.5-foot box culverts that stretch from ditch to ditch. Design will determine the best way to outfall I-75 storm drainage in this area and whether disruption of the existing culverts is necessary. Likewise the north crossing of the River Rouge at Squirrel Road (Sprague Branch) is enclosed in a 72 x 113 inch helical elliptical pipe. The lifespan of this pipe and the need to disrupt its ditch-to-ditch reach will be determined during design.

Response 3-3: MDEQ has agreed to the mitigation site in Macomb County in a letter dated December 21, 2004 (see Letter 6c).

Response 3-4: This information is included in the MDEQ letter (see Letter 6c).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 23 2004

REPLY TO THE ATTENTION OF:

B-19J

Mr. Abdelmoez A. Abdalla
Environmental Program Manager
Federal Highway Administration - Michigan Division
315 West Allegan St., Room 207
Lansing, Michigan 48933

Re: Comments on the Draft Environmental Impact Statement for the Proposed Widening and Reconstruction of I-75 from M-102 to M-59, Oakland County, MI, EIS No. 030592

Dear Mr. Abdalla:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the Proposed Widening and Reconstruction of I-75 from M-102 to M-59. Our comments in this letter are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Michigan Department of Transportation (MDOT) and the Federal Highway Administration (FHWA) have determined that I-75, the main north-south roadway through Oakland County, is currently experiencing congestion in the peak periods. This problem will worsen in the future to even more unacceptable levels of service. A study to address this corridor was completed in November 2000. The study recommended that I-75 be widened to four through travel lanes in each direction throughout Oakland County. U.S. EPA has previously concurred with the project's purpose and need. 4-1

The Draft EIS evaluated two alternatives in addition to the No Action alternative: (1) a general purpose lane from M-102 to M-59 and (2) a High Occupancy Vehicle lane from M-102 to M-59. The Draft EIS summarizes studies conducted to evaluate the possibility that rapid transit system could meet the project's purpose and need. The Draft EIS provides information as to why a rapid transit alternative does not eliminate the need to improvements on I-75.

Based on our review of the Draft EIS and conversations with MDOT staff, the U.S. EPA has rated the Draft EIS as an "EC-2" or "Environmental Concerns - Insufficient Information." This rating will be published in the Federal Register. While we have not identified environmental impacts that should be avoided or mitigation options that should be employed, we recommend that FHWA and MDOT clarify the following topics in the Final EIS: (1) the use of native vegetation in the project, (2) the analysis that was conducted for the indirect and cumulative impacts, and (3) the evaluation of the two build alternatives. 4-2

We commend MDOT for the selection of a two-cell detention pond to filter large and finer sediment particles from stormwater runoff, reducing the possibility of roadway contaminants affecting waterbodies. In addition to the two-cell approach, we recommend the use of native vegetation as part of the project's stormwater management plan. Native vegetation should also be considered for use along the right-of-way limits at depressed and at-grade elevations. Native vegetation would be particularly beneficial to enhance the quality of habitat and biological integrity of 13 Mile Drain where common urban wildlife species are located. Natives also help to discourage the advance of exotics and increase roadway aesthetics through the use of species with different blooming times. 4-3

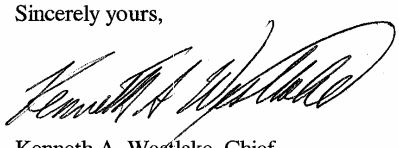
We reviewed the indirect and cumulative impact analysis in the Draft EIS and in a separate Technical Memorandum. We recommend more detailed information be included in the Final EIS that summarizes and explains the work that was done in the Indirect and Cumulative Impact Analysis Technical Report for this project. It appears that some key elements of the analysis were not appropriately summarized in the Draft EIS. In particular, we recommend that Chapter 5 (Analysis Process) and Chapter 6 (Conclusions) be summarized more completely in the Final EIS. It may be helpful to provide more detail in the Final EIS regarding how the congestion analysis was conducted and what results were yielded. MDOT and FHWA may want to consider including some of the figures from the technical report. Likewise, the connection between the conclusion that some roadway segments will have to be widened and the resulting resource impacts should be more completely summarized in the Final EIS. 4-4

Although High Occupancy Vehicle (HOV) lanes are included as an alternative for this proposal, the EIS does not fully discuss the development of this alternative. If the Final EIS is a tool to enable a decision maker to discern the differences between a HOV lane and a general purpose lane, we believe more information should be included in the Final EIS as to the benefits and impacts of both alternatives. Since HOV lanes have not been routinely evaluated in Michigan or in the region, we recommend that additional information be included in the Final EIS concerning the viability of an HOV lane alternative for this project. It would be useful to include information as to why this corridor has some viability, what operational benefits an HOV lane would have, and how an HOV lane could fit into the overall network. We understand that some businesses have expressed an interest in HOV lanes and carpooling. We recommend that the Final EIS include information on carpooling and the possible relationship with HOV lanes. 4-5

Letter 4 continued

Thank you for the opportunity to review and comment on this Draft EIS. Please send a copy of the Final EIS to our office once it has been prepared. Should you have any questions, please do not hesitate to contact Sherry Kamke of my staff at (312) 353-5794 or Kathy Kowal at (312) 353-5206.

Sincerely yours,



Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

cc: Ms. Margaret Bardondess
Environmental Section Manager
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Ms. Sue Datta, AICP
Project Manager
Michigan Department of Transportation
18101 West 9 Mile Road
Southfield, Michigan 48175

6.4.4 US Environmental Protection Agency – Letter 4

Response 4-1: EPA notes it had previously concurred with the project purpose and need. This is a reference to the streamlining process. The streamline process, which calls for concurrence at a number of milestones in project development, was discontinued midway through the DEIS stage, as impacts to wetlands have proved to be relatively minor.

Response 4-2: Comments acknowledged. These items have been addressed below and throughout this FEIS.

Response 4-3: Language has been added to mitigation Sections 5.6, Existing Vegetation, and Section 5.9, Surface Water Quality to provide for native vegetation, where appropriate.

Response 4-4: These changes have been made, and Section 4.18 has been revised. It includes more data and figures from the technical report. Congestion analysis was performed using the SEMCOG model. Details of the analysis are included in Section 4 of this FEIS and Section 6 of the revised technical report.[88]

Response 4-5: Additional text has been added in Section 3.9, Preferred Alternative. The Preferred Alternative is the HOV Alternative, Option C, as identified in Section 3.8. This

[88] *Indirect and Cumulative Impact Analysis Technical Report*, The Corradino Group, January 2005.

recommendation is consistent with the findings of an MDOT study conducted in 1999 to identify potential HOV lane development locations in Southeast Michigan.[89] The determination to dedicate the lane addition to HOV is based on the success of similar designations elsewhere that have increased corridor capacity. More persons can be moved per lane with HOV. There are few alternatives to I-75 for mid- to long-range trips. Transit analysis has found that, even with a rapid transit system on Woodward Avenue (the corridor designated through other planning studies as the priority corridor for high-type transit), little relief is provided to I-75. HOV is the best way to get the maximum use out of I-75. HOV lanes support bus transit development, vanpooling, and conventional carpooling. The potential exists to substantially increase people movement in these higher density modes. Oakland County, Automation Alley, and the county's business roundtable have all indicated their support for the HOV lane and their commitment to promoting carpooling/vanpooling in the county.

[89] *Southeast Michigan High-Occupancy Vehicle (HOV) Feasibility Study, Final Report*, Parsons Brinckerhoff Michigan, Inc. for the Michigan Department of Transportation, May 7, 1999.

JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF AGRICULTURE
LANSING

DAN WYANT
DIRECTOR

January 20, 2004

Ms. Margaret M. Barondess
Environmental Section Manager
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Dear Ms. Barondess:

I received your request for review and comment on the draft Environmental Impact Statement (DEIS) for the proposed reconstruction of I-75, from M-102 to M-59 and have reviewed the plans with Michigan Department of Agriculture staff.

This area of I-75 is a highly developed corridor and most of this reconstruction will be conducted within the existing right of way. We note no major impacts to agriculture as a result of this project. Our main concern, then, would be with the impact on established county, and particularly intercounty drains. At least 16 established drains are discussed to varying degrees in the DEIS. It remains important that this project continue to work with the office of John McCullough, Oakland County Drain Commissioner, to coordinate with his on-going maintenance work and minimize impact on these systems as a result of construction. We agree with and highly encourage the use of detention and surface runoff mitigation (absorbent drainage structures) to partially alleviate the impact of increasing impervious surface, and resulting runoff, due to additional lane construction. Beyond this, to the best of our knowledge, we do not have any additional concerns regarding the issues identified in the DEIS as it currently stands. 5-1

We appreciate being included in this DEIS review process. Please feel free to contact Abigail Eaton, Resource Specialist at 517/241-3933 if we can be of further assistance on this project.

Sincerely,

Dan Wyant
Director

6.4.5 Michigan Department of Agriculture – Letter 5

Response 5-1: Comment acknowledged. The Drain Commission has been contacted and coordinated with and will continue to be involved through the next phase of the project.

JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

STEVEN E. CHESTER
DIRECTOR

February 17, 2004

Ms. Margaret M. Barondess, Manager
Environmental Section
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Ms. Barondess:

SUBJECT: I-75 Widening and Reconstruction between M-102 (8 mile road) and M-59 in Oakland County, Draft Environmental Impact Statement

The Michigan Department of Environmental Quality (MDEQ), Geological and Land Management Division (GLMD), has completed review of the Draft Environmental Impact Statement (DEIS) for the I-75 widening and reconstruction project between M-102 (8 mile) and M-59 in Oakland County, Michigan.

The purpose and need of the proposed project is to increase the capacity of the transportation infrastructure in this corridor to meet travel demand for personal mobility and the movement of goods. There has been rapid growth in the mid and north areas of Oakland County since the roadway was built in the 1960's. The DEIS indicates that the roadway will need major reconstruction by the time this project ready for construction.

The following alternatives were considered:

1) No build
2) Mass Transit
3) Transportation Systems Management
4) Transportation Demand Management
5) Intelligent Transportation Systems
6) The addition of a 4th lane in each direction for general purpose use by all vehicles
7) The addition of a 4th lane in each direction for restricted use of high occupancy vehicles (two or more persons) in peak travel hours (HOV).

Alternatives 1, 6 and 7 were determined to be the practical alternatives to carry forward. Portions of alternative 3, 4 and 5 would be incorporated into the practical alternatives. Alternatives 6 and 7 would include improvements to the 12 mile and 14 mile interchanges, the north ramp of I-696, reconstruction of pedestrian bridges, construction

CONSTITUTION HALL • 525 WEST ALLEGAN STREET • P.O. BOX 30458 • LANSING, MICHIGAN 48909-7958
www.michigan.gov • (517) 241-1515

of a new storm water system in the south part of the corridor and new storm water retention in the north section of the corridor.
Without any road improvements the majority of this stretch of road is expected to operate at a level of service E or F by 2025. With the build alternatives the majority of the traffic is expected to operate at a level of service D or better in 2025. The DEIS estimates that 0.41 acres of direct wetland impact will occur with the HOV alternative.

Under the National Environmental Policy Act (NEPA) and Section 404 regulatory process for transportation projects, we agree on the second concurrence point as to the selection of the alternatives to carry forward. 6-1

We have the following comments:

1) Section 1.5 Permits, 5th bullet, page 1-16. The second sentence should read, "The Part 303 permit is reviewed and issued as a single permit that also includes Part 301 and Part 31.
2) Section 4.10.2 Water Quality and Groundwater, 1st paragraph, page 4-54. We agree that the use of detention/retention ponds is needed to control the increased volume of runoff created by the additional imperviousness.
3) 5.14 Wetland Mitigation, 1st paragraph, page 5-10. The MDEQ has not agreed to the use of this proposed site as mitigation to offset the 0.41 acres of wetland impacts associated with this project. Additional discussion is needed. 6-2

The following comments were provided by MDEQ's Air Quality Division.

4) Section 5.13 Control of Air Pollution during Construction, page 5-8. The third sentence in the third paragraph should read, " This permit should be applied for a minimum of 45 calendar days for plants with an active MDEQ permit (or 75 calendar days for plants not previously permitted in Michigan) prior to the plant being installed. The last sentence of this paragraph should be deleted as these are now handled by the Air Quality Division.
5) Section 4.7 EPA's guidance presumes that the PM 2.5 non-attainment area for southeast Michigan will include Oakland County, therefore, it would be prudent to include a PM 2.5 air quality impact analysis in the final EIS. 6-3
6) The discussion of air toxics on p. 4-30 is not written as clearly as desirable. Also, there is not adequate "transparency" in the discussion leading to the apparent decision to exclude air toxics emissions and impact analysis, and risk characterization. The MDEQ supports a quantitative assessment of emissions and impacts, with risk characterization, for select air toxics (formaldehyde, benzene, 1,3-butadiene, acetaldehyde and acrolein) associated with this project. The discussion on p. 4-30 lacks a clear and accurate discussion of this issue. There is much emphasis on concerns for inadequacies and unreliability or such modeling efforts. On the contrary, there are well established emissions, dispersion, and risk assessment tools enabling a risk characterization for these substances. These tools are recommended by the US Environmental Protection Agency and the MDEQ. The toxicity of these substances has been adequately 6-4

Letter 6a continued

demonstrated, and should not be ignored. We stand ready to work with the Michigan Department of Transportation to share our experiences in using these tools and toxicity benchmarks which can be utilized to characterize risks. The results should be appropriately caveated as estimates, but are nevertheless based on standard modeling and risk assessment tools.

If you have any questions, please contact me or Mr. Alex Sanchez at 517-335-3473.

Sincerely,

Alexander B. Sanchez

for Gerald W. Fulcher, Jr., P.E., Chief
Transportation and Flood Hazard Unit
Geological and Land Management Division
517-335-3172

cc: Mr. Abdel Abdella, U.S. Federal Highway Administration
Ms. Sherry Kamke, U.S. Environmental Protection Agency
Mr. Craig Czarnecki, U.S. Fish and Wildlife Service
Mr. Gary Mannesto, U.S. Army Corps of Engineers
Ms. Mary Vanderlaan, MDEQ
Mr. Bob Rusch, MDEQ
Mr. Alex Sanchez, MDEQ

6.4.6 Michigan Department of Environmental Quality – Letters 6a, 6b, and 6c

Response 6-1: MDEQ agrees on the 2nd concurrence point, Practical Alternatives. The streamline process, which requires concurrence at a number of milestones in project development, was discontinued midway through the DEIS stage, as impacts to wetlands have proved to be relatively minor.

Response 6-2: Comments acknowledged. The changes in sections 1.5, 5.13 and 5.14 have been made. Additional coordination has occurred and a letter dated December 21, 2004, confirms the proposed wetland mitigation site in Macomb County (see Letter 6c).

Response 6-3: The $PM_{2.5}$ analysis is presented in Section 4.7.

Response 6-4: The air quality analysis conducted for this study meets all US EPA requirements. Section 4.7 has been updated to reflect EPA's announcement in May 2004 of more stringent emission requirements for non-road diesel engines and reduced sulfur in fuel. These requirements will be in force by the time construction occurs. Quantitative assessment of emissions and impacts with risk characterization for select air toxics (formaldehyde, benzene, 1,3-butadiene, acetaldehyde and acrolein) is not required and continues to be the subject of scientific debate.

JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

STEVEN E. CHESTER
DIRECTOR

February 27, 2004

Ms. Margaret M. Barondess, Manager
Environmental Section
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Ms. Barondess:

SUBJECT: I-75 Widening and Reconstruction between M-102 (8 mile road) and M-59 in Oakland County, Draft Environmental Impact Statement

Please include the attached memo dated February 23, 2004, from Cheryl Wilson as an addendum to our February 17, 2004, response letter regarding the Draft Environmental Impact Statement for the above project. 6-5

If you have any questions, please contact me or Mr. Alex Sanchez at 517-335-3473.

Sincerely,

Gerald W. Fulcher, Jr., P.E., Chief
Transportation and Flood Hazard Unit
Geological and Land Management Division
517-335-3172

cc: Mr. Abdel Abdella, U.S. Federal Highway Administration
Ms. Sherry Kamke, U.S. Environmental Protection Agency
Mr. Craig Czarnecki, U.S. Fish and Wildlife Service
Mr. Gary Mannesto, U.S. Army Corps of Engineers
Ms. Cheryl Wilson, MDEQ, SE Michigan District
Ms. Mary Vanderlaan, MDEQ, SE Michigan District
Mr. Alex Sanchez, MDEQ, Lansing

CONSTITUTION HALL • 525 WEST ALLEGAN STREET • P.O. BOX 30458 • LANSING, MICHIGAN 48909-7958
www.michigan.gov • (517) 241-1515

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

RECEIVED
FEB 2 4 2004
ENVIRONMENTAL QUALITY
GEOLOGICAL & LAND MANAGEMENT

February 23, 2004

TO: Jerry Fulcher, Geological and Land Management Division
Transportation and Flood Hazard Unit

FROM: Cheryl Wilson, Remediation and Redevelopment Division
Southeast Michigan District Office

SUBJECT: Draft Environmental Impact Statement (DEIS)
I-75 from M-102 to M-59, Oakland County, Michigan

This office is in receipt of the Department of Transportation December 2003 DEIS. This is to inform you that we have files on the following properties listed in the statement:

6-5 Cont.

Name	Address	City	RRD Program
Auburn Court Assoc.	2740 Auburn Court	Auburn Hills	Part 201
Advanced Friction	1435 Wanda	Ferndale	Part 201
Biomagenic Reson	30781 Stephenson	Madison Heights	Part 213
Borden Dairy	30550 Stephenson	Madison Heights	213
City of Hazel Park	22600 North Chrysler	Hazel Park	201
Clark #2136	601 West 12 Mile	Madison Heights	213
DDR Station	510 West 14 Mile	Troy	213
DME Co.	29215 Stephenson	Madison Heights	213
Fuel Zone	31015 Stephenson	Madison Heights	213
G&W Gas	24309 John R	Hazel Park	213
Goddard Coatings	2280 Auburn	Auburn Hills	201
Humbolt Investment	1846-80 Austin	Troy	213
Jefferson Screw Prdts	1201 East 8 Mile	Hazel Park	213
John R Station former	23201 John R	Hazel Park	213
Kamax-G B Dupont	500 West Long Lake	Troy	213
KC Jones Plating	321 West 10 Mile	Hazel Park	201 & 213
Knight Construction	1931 Austin	Troy	213
Maschmeyer Concr.	32401 Mally	Madison Heights	213
NE LF & Sand Co	2715 Churchill	Pontiac	201
Saltarelli LF	Auburn & Opdyke-SE	Pontiac	201
SOCRRA	29740 John R	Madison Heights	201
Saturn Corp	434 West 12 Mile	Madison Heights	213
Sparks Tune-Up	1716 N Stephenson	Royal Oak	213
Sunoco #0001-4738	1490 East Maple	Troy	213
United #6199	23990 John	Hazel Park	213
Valenite Div	1100 West 13 Mile	Madison Heights	213
11 Mile & I-75 Food Mart	2419 East 11 Mile	Royal Oak	213

If you have any questions, please feel free to contact me at 734-953-1473.

cc: Oladipo Oyinsan, RRD

Cheryl L Wilson

Response 6-5: Comments acknowledged.

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

December 21, 2004

Ms. Lori Noblet
Michigan Department of Transportation
Project Planning Division
Environmental Section
P.O. Box 30050
Lansing, Michigan 48909

Dear Ms. Noblet:

SUBJECT: Proposed Wetland Mitigation Site on 33 Mile Road
T5N, R13E, Section 25, Armada Township, Macomb County

This letter responds to your request for approval of the proposed wetland mitigation site at the above mentioned location between North Avenue and Omo Road. The parcel is intended to provide mitigation for wetland impacts incurred by the M-53 Romeo Bypass project in Macomb County, and the I-75 project from M-102 (Eight Mile Road) to M-59 in Oakland County.

Wetland impacts incurred by the M-53 Romeo Bypass project was authorized by Michigan Department of Environmental Quality (MDEQ) permit number 02-50-0164-P. The permit required 24.26 acres of wetland mitigation for this project, and another 7.6 acres to replace a failing wetland for a past M-53 project, for a total of 31.86 acres. Partial mitigation of 13.02 acres for the recent M-53 Romeo Bypass project will occur on the east side of the new roadway in Section 26 of Bruce Township, while the remaining 18.84 acres will be mitigated at the parcel on 33 Mile Road.

Currently 42 incremental wetland takes are expected to be incurred by the I-75 corridor project, for a total impact of 0.4 acres. Proposed mitigation of 0.6 acres for this project is planned to be included in the overall wetland creation at the 33 Mile Road site.

Wetland impacts associated with the I-75 at Crooks/Long Lake Roads improvement project total 2.0 acres. These wetlands will be compensated by creating 3.3 acres of wetlands at the 33 Mile Road mitigation site.

According to information supplied by your office, approximately 30 acres of wetlands are expected to be created. The site will be designed as surface water depressional wetland. The soils consist of Sloan Parkhill and Ensley Parkhill, which are poorly drained, and have perched water tables near or at the surface. The mitigation as designed will capture surface water runoff from the upper watershed of approximately 100 acres. The design plan will incorporate minor grading, and construction of low head berms, along with water control structures. Additionally, the M-53 Romeo Bypass and I-75 projects and mitigation site are within the Clinton River Watershed.

CONSTITUTION HALL • 525 WEST ALLEGAN STREET • P.O. BOX 30458 • LANSING, MICHIGAN 48909-7958
www.michigan.gov • (517) 241-1515

Based on the wetland mitigation concept described above, and review of water budget data, this office approves of proposed mitigation design on the parcel location mentioned above. Final approval is contingent on receipt and satisfactory review of water budget data updates and final wetland design plans.

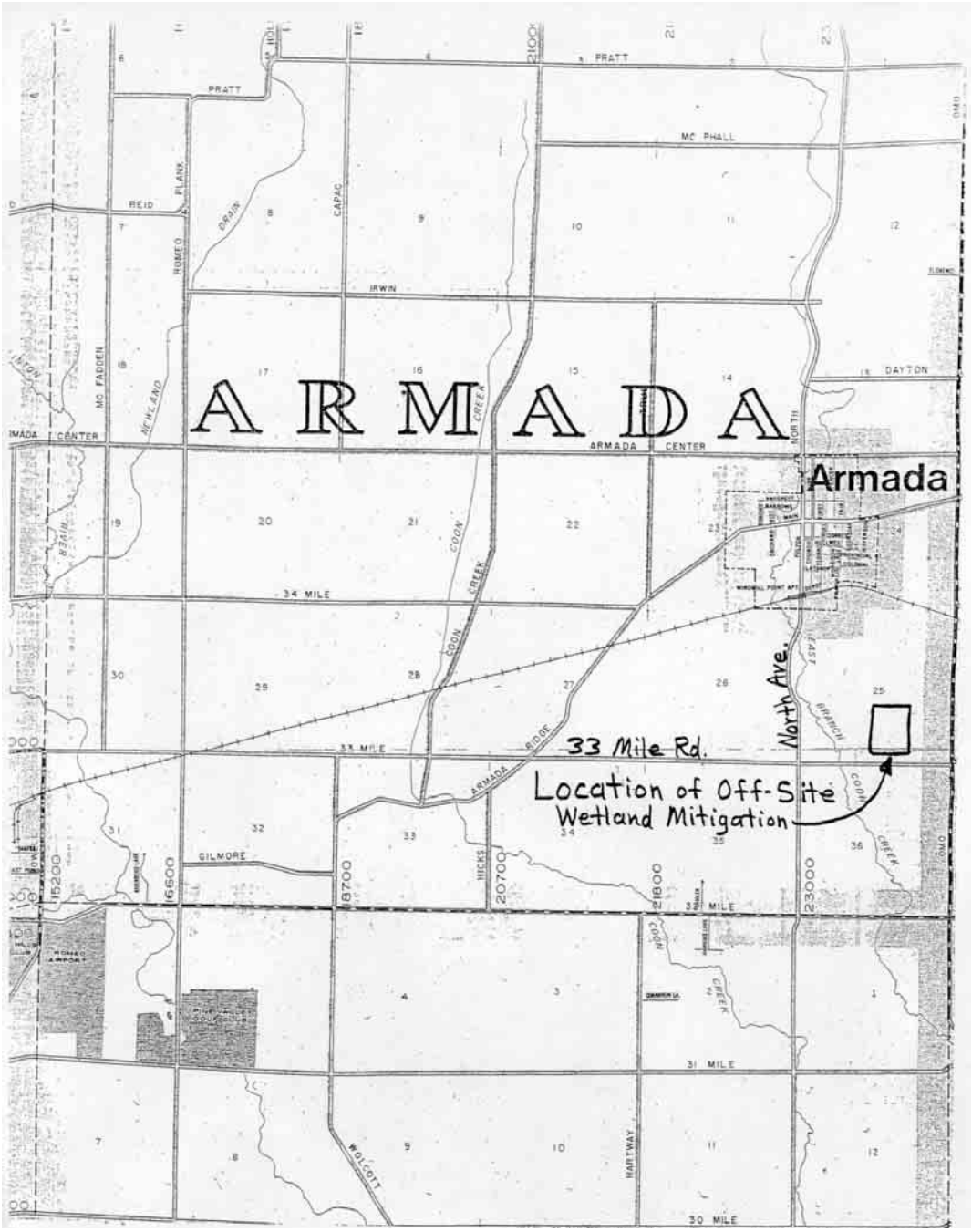
Should you have any questions in this regard, please feel free to contact me.

Sincerely,

Alexander B. Sanchez
Transportation and Flood Hazard Unit
Land and Water Management Division
517-335-3473

cc: Mr. Robert Owens, MDOT
Mr. Michael Pennington, MDOT
Mr. Gerald Fulcher, MDEQ

Letter 6c, continued



Response 6-6: Comments acknowledged. The design plan description has been included in Section 5.14, Wetland Mitigation.

Letter 7 February 20, 2004, Michigan Department of State, State Historic Preservation Office

STATE OF MICHIGAN
JENNIFER GRANHOLM, GOVERNOR
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES
LANSING
DR. WILLIAM ANDERSON, DIRECTOR

February 20, 2004

MARGARET BARONDESS
MICHIGAN DEPARTMENT OF TRANSPORTATION
425 WEST OTTAWA
PO BOX 30050

RE: ER-02-293 Draft Environmental Impact Statement, I-75 Freeway Improvement, Oakland County (FHWA)

Dear Ms. Barondess:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed and accept the draft Environmental Impact Statement (EIS) for the above-cited undertaking at the location noted above. 7-1

The State Historic Preservation Office (SHPO) is not the office of record for this **undertaking**. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Martha MacFarlane Faes, Environmental Review Coordinator, at (517) 335-2721 or by email at ER@michigan.gov. **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Martha J. MacFarlane

Martha MacFarlane Faes
Environmental Review Coordinator

for Brian D. Conway
State Historic Preservation Officer

MMF:DLA:ROC:bgg

copy: Abdelmoez Abdalla, FHWA

STATE HISTORIC PRESERVATION OFFICE, MICHIGAN HISTORICAL CENTER
702 WEST KALAMAZOO STREET • P.O. BOX 30740 • LANSING, MICHIGAN 48909-8240
(517) 373-1630
www.michigan.gov/hal

6.4.7 State Historic Preservation Office – Letter 7

Response 7-1: Comment acknowledged.

City of Madison Heights

City Hall Municipal Offices
300 W. Thirteen Mile Road
Madison Heights, MI 48071

Department of Public Services
801 Ajax Drive
Madison Heights, MI 48071

Fire Department
340 W. Thirteen Mile Road
Madison Heights, MI 48071

Police Department
280 W. Thirteen Mile Road
Madison Heights, MI 48071

March 9, 2004

Sue Datta, AICP
Project Manager
Michigan Department of Transportation
18101 W. Nine Mile Road
Southfield, MI 48075

RE: I-75 Draft Environmental Impact Statement

Dear Ms. Datta:

Thank you for the opportunity to comment on the I-75 Draft Environmental Impact Statement (DEIS). Attached is a copy of a City Council resolution regarding the I-75 DEIS. Please include this resolution in your considerations regarding the final Environmental Impact Statement.

We look forward to continued involvement and comment as this project progresses.

If you have any questions, please don't hesitate to contact me.

Sincerely,

THE CITY OF MADISON HEIGHTS

Jon R. Austin
City Manager

Area Code (248)

City Assessor	583-0820	Fire Department	588-3605	Personnel	583-0828
City Clerk	583-0826	43rd District Court	583-1800	Police Department	585-2100
City Manager	583-0829	Housing Commission	583-0843	Purchasing	837-2602
Community Development	583-0831	Library	588-7763	Recreation	589-2294
Department of Public Services	589-2294	Branch Library	541-7880	Senior Citizen Activity Center	545-3464
Finance	583-0846	Mayor & City Council	583-0829	Water & Treasurer	583-0845

The following is an excerpt from the minutes of a Regular Meeting of the Madison Heights City Council of the City of Madison Heights, Oakland County, Michigan held on Monday, March 8, 2004 at 7:30 p.m. Eastern Standard Time in the Municipal Building in said City.

Present: Mayor Pro Tem Clark, Councilmen Corbett and McGillivray, Councilwomen Scott and Shad.

Absent: Mayor Swanson and Councilwoman Russell (both excused).

77. Michigan Department of Transportation – I-75 Draft Environmental Impact Statement Resolution.

Motion by Councilman Corbett,
Supported by Councilwoman Shad,

WHEREAS, the Michigan Department of Transportation (MDOT) has prepared a Draft Environmental Impact Statement (DEIS) for the proposed widening and reconstruction of I-75 from M-102 to M-59; and,

WHEREAS, MDOT has asked for review and comment from the City of Madison Heights as well as from members of the public; and

WHEREAS, the City has reviewed the DEIS and offers the attached "Summary of Comments – I-75 Draft Environmental Impact Statement"; and

WHEREAS, the City generally supports improving the I-75 Corridor, including lane expansion as well as consideration of mass transit alternative components, and appreciates the opportunity to comment on this DEIS.

NOW THEREFORE BE IT RESOLVED, The City of Madison Heights recommends that MDOT incorporate the attached "Summary of Comments – I-75 Draft Environmental Impact Statement" into the Final Environmental Impact Statement.

Summary of Comments – I-75 Draft Environmental Impact Statement
The City of Madison Heights

General

- The City of Madison Heights supports the proposed I-75 improvements as a component of the measures needed to address the congestion issues within the I-75 Corridor.

- The City supports consideration of mass transit alternatives, in addition to the proposed I-75 improvements, as appropriate and supplemental methods of addressing current and future congestion within the I-75 corridor.

- The City is not committing to enforcement of any High Occupancy Vehicle (HOV) lane alternative. Should the proposed project ultimately include HOV lanes, enforcement should be the responsibility of the State Police. 8-1

Project Design/Improvements

- The proposed design maintains 10' wide interior shoulders, a noted safety concern. Are there alternative cross-section designs that can eliminate this issue within existing rights-of-way? 8-2

- The City supports MDOT's efforts to provide separated storm water management through this project. However, the DEIS does not provide detail as to the impact of this system on the on the City's residents, businesses and the George W. Kuhn (GWK) Drain District. 8-3

- The City recommends including extension of a westbound right turn lane on 12 Mile Road, past existing Home Depot driveway, within the project scope. 8-4

- Provide clarification of the traffic patterns and design resulting from the proposed EB/WB I-696 to NB I-75 braiding ramp. How high will the ramp be in relation to the adjacent residential area? How will EB/WB I-696 traffic get to Eleven Mile? Madison Heights opposes any design that doesn't provide I-696 traffic direct access to Eleven Mile Road. 8-5

- The City plans to install a sidewalk this summer on the south side of 14 Mile from Concord to Stephenson Hwy. The City would like this expense, within the I-75 project area, credited toward any local contribution that may be required relative to the I-75 project. 8-6

- The City plans to provide maintenance overlays for portions of the service drive at and near the I-75 project area (I-696 / I-75 area). The City would like this expense, within the I-75 project area, credited toward any local contribution that may be required relative to the I-75 project. 8-7

Non-Motorized Access

- The City recommends providing designated pedestrian and bicycle access across all proposed bridges and underpasses and if these non-motorized connections are approved, evaluate the need for the Bellaire Pedestrian Bridge and/or its relocation. 8-8

- The Project includes new sidewalk adjacent to service drive on the east side. The City supports this concept and recommends continuing this non-motorized path throughout the project area (north to 14 Mile) with a design to accommodate bicycle traffic.

- The project includes removal of the I-75/Red Run Bridge. This will eliminate or minimize the potential for any future GWK, pedestrian/bicycle access across I-75 via the existing bridge system. Alternatives must be considered to ensure future access in this regard. 8-9

Local Road Impacts

- The DEIS generally references the extensive impact the proposed improvements will have on the adjacent road network (56 miles +), but does not address specific adjacent street improvement costs and impacts or the funding mechanisms necessary to mitigate those impacts. The DEIS must identify both the specific impacts as well as the funding mechanism to address those impacts. 8-10

- The DEIS generally references the extensive impact on adjacent streets and communities during actual construction, but does not address mitigation of these impacts, including costs or the funding mechanisms to mitigate those impacts. 8-11

Neighborhood Impacts

- The DEIS identifies the taking of eight (8) single-family homes and portions of other parcels in Madison Heights. Alternative solutions to the I-696 to NB I-75 ramp and service drive design should be sought to avoid or minimize the impact on the adjacent residential areas. 8-12

- ❑ The DEIS does not identify the specific homes generally noted in the DEIS as being impacted by noise. These impacted properties should be located on an aerial photograph to assist in evaluating the impact on City residents. 8-13

- ❑ The City recommends additional evaluation of the existing and proposed sound to be generated in the area from I-696 to 11 Mile. The DEIS needs to clarify the design, materials, cost(s), maintenance and jurisdiction of the sound walls. The City does not support transferring responsibility for maintenance and reconstruction from MDOT to the City. 8-14

- ❑ Local access and diverted through-traffic during construction will be maintained via service drives. The DEIS does not adequately address safeguards to protect adjacent neighborhoods from this impact, including analysis of closing / restricting access to side streets during construction as well as on a permanent basis. 8-11 Cont.

Interchange Impacts

- ❑ The City supports use of land area freed up by new interchanges for private economic development, where appropriate based on adjacent land uses and parcel configurations. The proceeds from the sale of property should be credited toward any local contribution that may be required relative to the I-75 project. 8-15

- ❑ Provide additional clarification of alternatives being considered for the 14 Mile interchange, in light of the consultant's finding that the single point design will not function. 8-16

Yeas:	Mayor Pro Tem Clark, Councilmen Corbett and McGillivray, Councilwomen Scott and Shad.
Nays:	None
Absent:	Mayor Swanson and Councilwoman Russell (both excused).

I, the duly authorized City Clerk of the City of Madison Heights do hereby certify that the foregoing is a true and correct copy of a resolution adopted by the Madison Heights City Council on Monday, March 8, 2004.

Geraldine A. Flack
Geraldine A. Flack
City Clerk

6.4.8 City of Madison Heights – Letter 8

Response 8-1: The implementation of HOV is a number of years away, offering the opportunity for addressing the terms of enforcement. Responsibilities for enforcement of traffic laws are now shared by the Michigan State Police and local jurisdictions. Additionally, funding sources will be explored for enforcement activities that may help alleviate the burden for local jurisdictions. However, it should be noted that in some locations, local jurisdictions are allowed to retain proceeds from tickets issued by their police officers for HOV violations. Details will be coordinated through the next phases of the project.

Response 8-2: The ten-foot median shoulders meet current design standards. Construction of a wider shoulder of 12 feet was studied. It was determined that such shoulders would result in increased impacts in the form of acquisitions/relocations (Section 3.7.3), the cost of which could exceed an additional $100 million. It was not considered a practical alternative

Response 8-3: I-75 storm water now flows into a combined sewer system (meaning storm water mixes with sewage in one set of pipes) that flows to the Detroit treatment plant via the Twelve Towns Combined Sewer Overflow system. The Preferred Alternative will separate these flows, thus reducing the potential for overflow of sewage into the Red Run Drain during storm events. The storm water would be redirected to the Red Run drain downstream of the Twelve Towns Combined Sewer Overflow system. During normal flow periods, the Red Run drain can accommodate this flow. During storm events, I-75 storm water would continue to go to Red Run drain as it does today, but it would not mix with sewage that flows to Red Run Drain today under overflow conditions via the Twelve Towns Combined Sewer Overflow system. The preliminary cost estimate for the changes to the storm water system is $11 million and is included in overall project costs. Details of the effects on the Twelve Towns system and the Detroit Treatment facility will be determined during the design phase.

Response 8-4: This request is in conflict with FHWA policy that calls for a easy-to-understand point of divergence to the lane that becomes the ramp. Otherwise a motorist turning right out of Home Depot could become "trapped" and inadvertently be forced onto northbound I-75. This is not recommended as a part of the improvements.

Response 8-5: The modified braid design maintains the existing access to 11 Mile Road from I-696. The ramp braid connecting I-696 to northbound I-75 would be at ground level. The off ramp from northbound I-75 to the service drive would pass underneath, below ground level.

Response 8-6: 14 Mile Road sidewalks will be reconstructed as necessary, when the project is implemented. There is no mechanism available for crediting construction in 2004 to the required local share.

Response 8-7: It is now anticipated that the northbound I-75 service drive in Madison Heights would be totally reconstructed to accommodate the proposed separated storm sewer that would carry storm water from I-75. That reconstruction is included in the overall project cost. Again, there is no mechanism available for crediting near-term costs to the project.

Response 8-8: Pedestrian access is maintained or improved at all existing pedestrian locations in Madison Heights. The Bellaire bridge was evaluated and will be replaced at its existing location, as it serves the St. Dennis Parish Elementary School.

Response 8-9: A non-motorized path may be considered when a countywide non-motorized plan is developed and adopted. Oakland County is currently in the process of developing such a plan. Completion is expected in 2005. No modification to the Red Run Drain overpass will preclude a future non-motorized link under I-75, if such a recommendation is part of the adopted non-motorized plan for the county.

Response 8-10: This FEIS covers the impact and mitigation on the freeway component. Local improvements will be cleared environmentally by the responsible local agency, including mitigation plans. Impacts to the adjacent road network are included in Tables 4-22 and 4-23 of the indirect and cumulative effects analysis. Funding for each of the independent projects will be determined through the long-range planning process by the responsible agency.

Response 8-11: Discussion of the maintenance of traffic during construction is included in Section 5.10. The maintenance of traffic program will be developed through local coordination during the design phase in order to minimize impacts to the greatest extent possible. Costs and mitigation will then be refined.

Response 8-12: Additional analysis was conducted for the ramp braid in order to minimize traffic and access impacts. The modified braid design was developed in coordination with local municipalities to minimize impacts (ROW and access). The modified braid will offer substantial safety and congestion benefits. However, 23 houses in Madison Heights will be impacted. The design will be further refined in subsequent phase of the project.

Response 8-13: This information has been provided to the city of Madison Heights on October 22, 2004.

Response 8-14: Eighteen noise walls totaling 4.9 miles in length are proposed. These are listed in Table 4-12 and explanatory text is found in Section 4.8.5. Locational information on individual structures is available in Appendix C of the *Noise Study Report*, January 2005. The State Transportation Commission's Policy on Noise Abatement states that local authorities must agree to provide: 1) a share of the state and local funding based on population (per State of Michigan Act 51); 2) aesthetic maintenance on the residential side of the structure, or on both sides when the structure is on the residential side of a service road; and, 3) structural maintenance after five years when the structure is on the residential side of a service road. Failure to meet all of the above requirements will make the noise abatement project "unreasonable" for purposes of the noise policy, meaning it will not be built. Noise wall design, costs, and materials will be coordinated in the design phase of the project with local input.

Response 8-15: Any excess land will continue to be MDOT property.

Response 8-16: The SPUI was found to have operational limits and is not recommended at 14 Mile Road. A SPUI design operates best when opposing turn movements are relatively balanced, using the full capacity of the intersection. Travel demand in the area is unbalanced due to the presence of Oakland Mall and other numerous commercial developments to the east of I-75. Capacity analysis found that at the central traffic signal serving the SPUI intersection, the level of service (LOS) would be F during the afternoon traffic peak due to the imbalance of traffic on 14 Mile Road resulting from commercial development/access. A more conventional reconstruction of the interchange offers a better solution at this interchange, with all movements at a LOS of D or better.

City of Royal Oak
Michigan

MEMBER MICHIGAN MUNICIPAL LEAGUE

March 2, 2004

Ms. Sue Datta, ACIP
Project Manager
Michigan Department of Transportation
18101 W. Nine Mile Road
Southfield, Michigan 48075

Subject: **I-75 Draft Environmental Impact Statement City of Royal Oak "Comments"**

Dear Ms. Datta:

The City of Royal Oak thanks the Michigan Department of Transportation for the opportunity to provide comments on the proposed I-75 Widening Project from M-102 (8 Mile) to M-59. Royal Oak has no objections to the proposed I-75 widening because the improvement is needed to increase the freeway capacity and the project is good for the region.

The City of Royal Oak comments, concerns, and objections related to the proposed I-75 Project are addressed in the following **attached** documents: (1) I-75 Draft Environmental Impact Statement Comment Form; (2) Proposed I-75 Widening from 8 Mile to M-59 Environmental Impact on Royal Oak Report; and (3) City of Royal Oak City Commission Resolution.

If you have any additional concerns, please call me at 248.246.3260.

Yours truly,

Dick Cole, P.E.
City Engineer

DC/sm
cc: Joseph Corradino, The Corradino Group, First Centre, Ste. 300 N. 200 S. 5th St., Louisville, KY 40202
I-75 Widening E.I.S.

211 Williams Street • P.O. Box 64 • Royal Oak, MI 48068-0064 • Phone Area Code (248)

Assessor	246-3110	Engineering	246-3260	Ice Arena	246-3950	Recreation	246-3180
Building Insp.	246-3210	FAX	246-3001	Info Systems	246-3080	Rental Assistance	246-3290
Cable TV (WROK)	246-3770	Finance	246-3030	Motor Pool	246-3370	Senior/Community Ctr	246-3900
City Attorney	246-3240	Fire Dept. (Bus)	246-3800	Planning & Zoning	246-3280	TDD	246-3010
City Clerk	246-3050	General Info.	246-3000	Police Dept. (Bus)	246-3500	Treasurer	246-3140
City Manager	246-3200	Housing Assistance	246-3130	Public Service Dept	246-3300	Water Bills	246-3160
Code Enforcement	246-3210	Human Resources	246-3070	Purchasing	246-3202		

I-75 DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENT FORM

The Michigan Department of Transportation (MDOT) has performed an environmental and early preliminar engineering analysis for I-75 between M-102 (8 Mile Road) and M-59 in southeastern Michigan. Two practic alternatives have been identified. The first alternative would reconstruct and add a lane to I-75 from three to four trav lanes in each direction. The second alternative would also reconstruct and add the lane in each direction, but the lan would be limited to High Occupancy Vehicles (HOV) during morning and afternoon peak travel periods, approximate four (4) hours a day. This is your opportunity to comment on the Draft Environmental Impact Statement (DEIS), whic provides background on the project and presents the impacts of these two alternatives.

GET INVOLVED!

Your comments are important and will become a matter of public record. A Final Environmental Impact Statement will be prepared after the close of the comment period, which will occur 45 days after the Public Hearing, or March 12, 2004. The Final Environmental Impact Statement will summarize all comments received on the DEIS and respond to them.

* * * PLEASE PRINT CLEARLY * * *

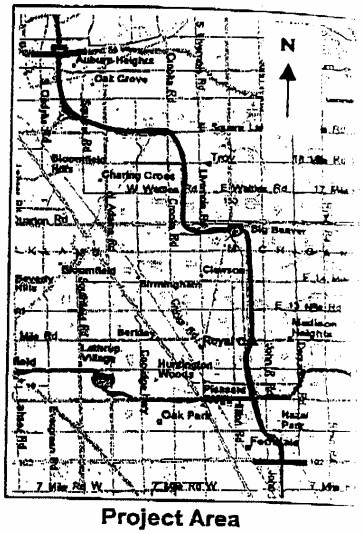
Name Dick Cole, City Engineer
Address City Hall, 211 Williams Street
City / Zip Royal Oak, MI 48067
Email richardc@ci.royal-oak.mi.us

TELL US WHAT YOU THINK.

We want to know what you think. Is there an issue we did not address? Everything you say about this project is important. Please use the space below and on the back. Turn your comment form in to available staff at the Public Hearing, or give your comments orally to the court recorder available in the room. If you wish, you may mail your comments or email them (see back of this sheet for more information).

The City of Royal Oak comments, concerns, and objections related to the proposed I-75 Widening Project are addressed in the following attached documents: (1) Proposed I-75 Widening from 8 Mile to M-59 Environmental Impact on Royal Oak Report; and (2) City of Royal Oak City Commission Resolution.

Additional Comments



Project Area

If possible, please return this before you leave. If not, please mail it to:

Ms. Sue Datta, ACIP
Project Manager
Michigan Department of Transportation
18101 W. Nine Mile Road
Southfield, MI 48075
Fax: 248.569.7718

e-mail us by visiting our Web site at www.michigan.gov/MDOT/ and clicking on "Projects and Programs" and then "Studies" and then" I-75 Oakland County Corridor Study" and then "Contact Us."

I:\projects\3070\publiccommentform.075.doc

COMMISSION LETTER # 045
COMMISSION MEETING OF: 3/1/04
SUBJECT: **Proposed I-75 Widening from 8 Mile to M-59 Environmental Impact on Royal Oak**

February 25, 2004

MEMO TO: **Lawrence M. Doyle, City Manager**

FROM: **Dick Cole, City Engineer**

SUBJECT: **Proposed I-75 Widening from 8 Mile to M-59 Environmental Impact on Royal Oak**

This report describes the impacts of the Proposed I-75 Widening Project on Royal Oak and provides recommended comments to the Draft Environmental Impact Statement for the project. General information about the project was addressed in Commission Memo of 1/30/04 which included the "Draft Environmental Impact Statement – Summary". This report also includes answers to Commissioner Tom Hallock's questions given in his e-mail letter of 2/3/04, see **Exhibit A.**

Proposed I-75 Widening Project Impacts on Royal Oak

I. **Traffic Impacts**
The estimated traffic impacts on Royal Oak from the proposed I-75 Widening Project are as follows:

A. **Elimination of I-696 traffic Access to the I-75 off ramp at 11 Mile**
The project includes braiding two northbound freeway ramps at the I-696/I-75 interchange to reduce the frequency of northbound I-75 traffic back-ups. The I-75 back-ups are caused by eastbound and westbound I-696 traffic exiting northbound to I-75. The MDOT proposal is to have the northbound I-75 off-ramp to 11 Mile Road pass under the northbound I-75 on-ramps from I-696 to prevent merge/diverge conflicts. This is called "braiding" the ramps **(see Exhibit B).** The I-75/I-696 intersection ramp modification causes the following traffic impacts in Royal Oak: 9-1

- **Removal of Dallas Bridge over I-75**
The Dallas bridge over I-75 will be removed for the ramp braiding construction. MDOT is proposing that a westbound quick turnaround bridge be installed on the south side of the Lincoln Bridge to service the westbound Dallas Bridge traffic. The estimated average daily westbound Dallas bridge traffic is 2,720 vehicles per day. It is estimated that this traffic will be going southbound on Stephenson and westbound on the I-696 Service Drive to its destination. This traffic increase will impact homes along Stephenson south of Lincoln and parents and busses going to and from Oakland School on Brockton. 9-2

  Eastbound Dallas traffic was not studied as part of this report but will need to be addressed by MDOT in their final report.

- **Removal of east/west I-696 traffic exit to 11 Mile Rd. from I-75**
  As part of I-696/I-75 interchange northbound ramp braiding, the east/west I-696 traffic exit to 11 Mile from I-75 is eliminated. This impacts Royal Oak by increasing traffic at other exits from I-696 and I-75 that service the City, see **attached** report, **Exhibit C**. As shown on **Exhibit C**, the estimated traffic increase to City roadways due to this change is as follows:

Westbound 12 Mile Rd. west of I-75	+92 vehicles/day
Westbound 11 Mile Rd. west of Ryan	+92 vehicles/day
Northbound Mohawk exit north of I-696	+1,192 vehicles/day
Northbound Campbell Rd. north of I-696	+458 vehicles/day

9-1 Cont.

B. Removal of Fourth Street Access to Southbound I-75 Ramp
The project includes relocating the southbound I-75 on-ramp at Fourth about 220 feet north of its current location. The estimated current eastbound Fourth Street traffic that enters southbound I-75 at this location is 1,840 vehicles/day. It is estimated that these vehicles will continue to use Fourth to access I-75, see **Exhibit D** and they will increase northbound traffic on Helene, Minerva, and Edgeworth to access the freeway from 11 Mile. The estimated northbound traffic increase on these residential streets is as follows:

9-3

Helene north of Fourth Street	+920 vehicles/day
Minerva north of Fourth Street	+460 vehicles/day
Edgeworth north of Fourth Street	+460 vehicles/day

C. Relocation of the Northbound I-75 Exit Ramp to S. of Lincoln
As part of the proposed northbound I-75/I-696 ramp braiding improvement, the northbound I-75 exit ramp will be relocated south of Lincoln, see **Exhibit B**. This ramp relocation is estimated to increase traffic on Lincoln by 399 vehicles/day.

9-4

D. Decrease in Westbound 11 Mile Rd. Traffic West of I-75
The proposed northbound I-75/I-696 ramp braiding improvement will reduce westbound 11 Mile Rd. traffic into Royal Oak from the I-696 freeway. This proposed ramp braiding is estimated to reduce westbound 11 Mile Rd. traffic west of the I-75 freeway by 1,660 vehicles/day.

RECOMMENDATIONS: **IT IS RECOMMENDED that** the proposed I-75 Widening Project not remove the east/west I-696 exit to Eleven Mile Road at I-75 because of increased traffic and/or safety concerns in Royal Oak on Mohawk area residential streets north of I-696, on southbound Stephenson Highway south of Lincoln, and on westbound Lincoln west of I-75 caused by the proposed freeway changes.

9-1 Cont.

IT IS FURTHER RECOMMENDED that the proposed I-75 Widening Project not remove the east/west I-696 exit to Eleven Mile Road at I-75 because of detrimental economic impacts to Royal Oak Eleven Mile Road business.

IT IS FURTHER RECOMMENDED that the proposed I-75 Widening Project not remove the eastbound Fourth Street access to southbound I-75 because of increased traffic and safety concerns on the following Royal Oak Residential streets; Helene north of Fourth; Minerva north of Fourth; and Edgeworth north of Fourth caused by the freeway change. 9-3 Cont.

II. City Commissioner Comments

The **attached** e-mail from Commissioner Marie Donigan addresses the need for a more in-depth study of the impacts of Mass Transit in the "Draft Environmental Impact Statement for the Proposed I-75 Widening Project from 8 Mile to M-59". The need for mass transit between Detroit and Pontiac in the Woodward Corridor would have many benefits such as: Getting cars off the road, supporting job growth in Oakland and Wayne Counties, reducing pressure on the road system in general, and reducing air pollution. The I-75 Widening Project Environmental Impact Statement should include a serious and committed debate on an alternative transit system. 9-5

III. Public Safety and Pubic Service Comments

A. Fire Department

The City Fire Department has reviewed the M.D.O.T. proposed I-75 Widening design and has determined three problems with the proposed design, see **attached** memo from Chief Richard Strehlke. The Fire Department problems are as follows:

- The Dallas Bridge should not be removed as it is needed as a lookout point to locate life safety problems in the I-75/I-696 interchange. The lookout point is used to direct emergency vehicles to the life safety problem location. 9-2 Cont.
- The southbound I-75 on-ramp at Fourth Street should not be moved north of Fourth Street as this relocation will increase emergency vehicle response time to freeway life safety problems. 9-3 Cont
- The northbound I-696 exit to 11 Mile Rd. at I-75 should not be eliminated because removing this exit could increase emergency vehicle response time to freeway life safety problems. 9-1 Cont

In addition, the Fire Department wants to review and have input into the proposed I-75 widening construction traffic detour routes for public safety. 9-6

B. Police Department

The Police Department has reviewed the M.D.O.T. proposed I-75 Widening design and has determined five problems with the proposed design, see **attached** memo from Sgt. Christopher M. Jahnke. The Police Department problems are as follows:

- The northbound I-696 exit to 11 Mile should not be eliminated because removing this exit will reintroduce higher traffic volumes on Mohawk north of I-696. The City has recently (2002/2003) spent significant time and money to mitigate the Mohawk cut-through traffic problems caused by the I-696 freeway. The proposed M.D.O.T. I-75 Widening design is estimated to raise Mohawk traffic volumes significantly above the (2002/2003) problem levels. The increased Mohawk area traffic will require increased police enforcement and will generate new neighborhood problems. 9-1 Cont.

- The southbound I-75 entrance ramp at Fourth Street should not be moved north because moving this entrance ramp north of Fourth Street is estimated to increase traffic on Helene, Minerva, and Edgeworth and this traffic increase will require increased police enforcement and will generate new neighborhood problems. 9-3 Cont.

- The I-75 off-ramp at 11 Mile should not be relocated south of Lincoln because relocating the off-ramp south of Lincoln will increase traffic on Lincoln causing increased police enforcement and neighborhood problems. 9-4 Cont

- The Dallas Bridge should not be removed because the removal of the Dallas Bridge over I-75 will increase South End police response times between Royal Oak and Madison Heights Police Departments. 9-2 Cont

- The above proposed I-75 changes should not be made part of the I-75 Widening Project because the additional traffic problems generated by the above changes may increase Royal Oak Police staff levels in the Traffic Safety Division 9-1 Cont.

C. Department of Public Service

The Department of Public Services has reviewed the M.D.O.T. Proposed I-75 Widening design and has determined the design will not affect service provided by the Department, see **attached** memo from Greg Rassel, Public Works Superintendent.

IV. <u>I-696 Freeway Soundwall Problems North of Westbound 10 Mile</u>

The I-696 sound walls north of westbound 10 Mile Road adjacent to Royal Oak should be repaired as part of the current "Preserve first" M.D.O.T. Road Improvement Program.

The collapsing and deteriorating I-696 sound walls north of westbound 10 Mile in Royal Oak caused by a defective expansion joint design has been known by M.D.O.T. from at least 8/28/90.

M.D.O.T. has not corrected this significant sound wall safety problem in Royal Oak caused by the freeway design flaw. Numerous letters have been written to M.D.O.T. and state elected officials to correct this problem but to date funding to correct the problem has not been scheduled.

V. **Property Taken for Right-of-Way**

There are no houses or institutional or commercial properties in Royal Oak on southbound Stephenson that will need to be taken in whole by the project. There are no building removals required in Royal Oak as part of the proposed project.

There are three locations in Royal Oak where small pieces of property are being considered for purchase by MDOT for the Proposed Project to allow for proper sidewalks and greenbelts if southbound Stephenson is slightly realigned for the work. The location of each proposed right-of-way purchase is shown on **Exhibits E, F, and G**. The City Assessor has determined the estimated total loss in Royal Oak tax revenue for these three small right-of-way purchases is $58.00/yr., see **Exhibit H.**

In addition to the three (3) small Right-of-Way purchases, MDOT will need a grading permit to grade a portion of the east edge of Maddock Park to match the new proposed adjacent sidewalk elevation along Stephenson for the proposed new Stephenson Highway alignment. The new proposed southbound Stephenson Highway alignment is shown on **Exhibit E, F, and G.**

VI. **Noise**

Increased noise caused by the proposed I-75 Widening Project is estimated at 1 decibel in Royal Oak. Mr. Ted Stone, Vice President of the Corradino Group that prepared the Draft Environmental Impact Statement for the I-75 project, stated that a 1 decibel change in volume is unperceptible to the human ear. It takes a 3 decibel increase in volume for a person to determine a change in volume has occurred.

No sound walls will be relocated on the west side of I-75 in Royal Oak for the project. Some sound wall relocation will occur north of I-696 adjacent to Madison Heights for the proposed interchange ramp braiding improvement.

VII. **Schedule**

If the outcome of the Public Hearing for this project is to reconstruct I-75, design and construction will await available funding. A number of capacity improvement projects statewide have been deferred, as MDOT is dedicated to a "preserve first" philosophy.

This philosophy is to improve the existing infrastructure, and the goal is to restore 95 percent of Michigan's freeways and 85 percent of its non-freeways to a "good" condition by 2007. Deferred projects will be added to the Five-Year Program on a priority basis, based on available funding, when MDOT can meet and sustain the condition goal and when additional revenues are available.

The Environment Impact Statement Public Input process on Federal Highway Projects requires that Public Comments be sent to MDOT within 45 days of the Public Hearing for the proposed improvement. The Public Hearing for the Proposed I-75 Widening Project was held on 1/27/04 and Public Comments on the Project must be sent to MDOT by March 12, 2004.

If the City Commission is in agreement, the following resolution is offered for the City of Royal Oak Comments on the Draft Environmental Impact Statement for the Proposed I-75 MDOT Widening Project from M-109 (8 Mile Rd.) to M-59:

CITY COMMISSION RESOLUTION:

BE IT RESOLVED that the City of Royal Oak requests that before the proposed M.D.O.T. I-75 Widening Project between 8 Mile Road and M-59 is started, the collapsing and badly deteriorated sound walls caused by a defective sound wall expansion joint design on the north side of westbound 10 Mile Road adjacent to Royal Oak be properly repaired under the current "Preserve first" M.D.O.T. Road Improvement Program.

BE IT FURTHER RESOLVED that the "Draft Environmental Impact Statement for the Proposed I-75 Widening Project" include a more in-depth study of the impacts of Mass Transit in the Woodward Corridor between Detroit and Pontiac including the reduction of vehicles on area roadways, reduction in air pollution in the metropolitan area, and increased job growth in Oakland and Wayne Counties.

9-5 Cont.

BE IT FURTHER RESOLVED that the proposed I-75 Widening Project not remove the east/west I-696 exit to Eleven Mile Road at I-75 because of increased traffic and public safety concerns in Royal Oak on Mohawk area residential streets north of I-696, on southbound Stephenson Highway south of Lincoln, and on westbound Lincoln west of I-75 caused by the proposed freeway changes.

9-1 Cont

BE IT FURTHER RESOLVED that the proposed I-75 Widening Project not remove the 11 Mile Rd. exit from northbound I-696 because this exit could increase emergency vehicle response time to southbound I-75 life safety problems.

BE IT FURTHER RESOLVED that the proposed I-75 Widening Project not remove the 11 Mile Rd. exit from northbound I-696 because of detrimental economic impacts on Royal Oak Eleven Mile Road business.

BE IT FURTHER RESOLVED that the proposed I-75 Widening Project not relocate the eastbound Fourth Street entrance ramp to southbound I-75 because of increased traffic and public safety concerns on the following Royal Oak residential streets; Helene north of Fourth; Minerva north of Fourth; and Edgeworth north of Fourth caused by the freeway change. 9-3 Cont

BE IT FURTHER RESOLVED that the eastbound Fourth Street entrance ramp to southbound I-75 not be relocated north because of increasing emergency vehicle response times to life safety problems on the freeway.

BE IT FURTHER RESOLVED that the Dallas Bridge over I-75 not be removed as it will increase Police Department and Fire Department emergency vehicle response times between Royal Oak and Madison Heights and to I-696/I-75 interchange life safety problems. 9-2 Cont

BE IT FURTHER RESOLVED that the proposed I-75 Widening improvement problems addressed in this resolution be eliminated to mitigate additional Royal Oak Police Department costs created by the proposed freeway changes. 9-1 Cont.

BE IT FURTHER RESOLVED that the City of Royal Oak be allowed to provide meaningful input into the construction detours selected for the proposed I-75 Widening Project to reduce the impact of detour traffic on Royal Oak residents and provide for proper public safety. 9-6 Cont.

Dick Cole, P.E.
City Engineer

APPROVED:

Lawrence M. Doyle
City Manager

DC/sm